

**RSPO PRINCIPLE AND CRITERIA –
ANNUAL SURVEILLANCE ASSESSMENT 1_4
Public Summary Report**

PT. Agro Muko (SIPEF Group):
Client company Address: Forum Nine Building, 10th Floor, Suite 1-11 Jl.Imam Bonjol No.9 Medan – 20112 Sumatera Utara Province Indonesia
Certification Unit: PT. Agro Muko – Bunga Tanjung Palm Oil Mill Location of Certification Unit: Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0021-05-000-00	Membership Approval Date	7 th December 2005
Parent Company Name	SIPEF Group		
Address	Head Office: Forum Nine Building, 10th Floor, Suite 1-11 Jl.Imam Bonjol No.9 Medan – 20112 Sumatera Utara Province Indonesia		
Subsidiary (Certification Unit Name)	Bunga Tanjung Palm Oil Mill		
Address	Plantation Office: Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia		
Contact Name	Mr. Sander Van den Ende		
Website	www.tolantiga.co.id	E-mail	svdende@sipef.com
Telephone	+62 61 415 2043	Facsimile	+62 61 452 0908

2. Certification Information			
Certificate Number	RSPO 646338	Date of First Certification	22 nd February 2011
		Certificate Start Date	22 nd February 2016
		Certificate Expiry Date	21 st February 2021
Scope of Certification	<p>Production of sustainable Crude Palm Oil (CPO) and Palm Kernel (PK) at Bunga Tanjung Palm Oil Mill with marketing activities through SIPEF N.V.</p> <p>The supply base consist of: Four (4) company-owned estates, namely: Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate, Malin Deman Estate. The company-owned estates also fully-managing 23 <i>Kebun Masyarakat Desa/KMD</i> belong to surrounding villages. Two (2) scheme smallholders cooperatives namely: Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS) and Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA), are also under full management of company-owned estate.</p>		
Applicable Standards	RSPO P&C 2018, November 2018; RSPO Certification System, June 2017;		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
10105654	ISO 9001:2015	Lloyd's Register Indonesia	3 July 2018 – 2 July 2021

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Bunga Tanjung POM	Brangan Mulia Village, Teramang Jaya District,	02°43'00.39"S	101°22'16.94"E

	Mukomuko Regency, Bengkulu Province, Indonesia		
Bunga Tanjung Estate*	Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	02°43'30.14"S	101°22'21.51"E
Air Bikuk Estate*	Air Bikuk Village, Lubuk Bento Village and Air Berau Village, Pondok Suguh District, Mukomuko Regency, Bengkulu Province, Indonesia	02°46'27.67"S	101°24'44.68"E
Air Buluh Estate*	Air Buluh Village, Semundam Village, Tanjung Jaya Village, Talang Baru Village and Talang Arah Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	03°01'27.29"S	101°33'15.79"E
Malin Deman Estate*	Air Merah Village, Talang Arah Village and Talang Baru Village, Malin Deman District, Mukomuko Regency, Bengkulu Province, Indonesia	03°01'27.29"S	101°33'15.79"E
Kebun Masyarakat Desa/KMD	Mukomuko Regency, Bengkulu Province, Indonesia	02°36'25.05"S	101°16'40.26"E
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	Air Merah Village and Air Buluh Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	03°03'15.11"S	101°29'53.43"E
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	Air Merah Village and Air Buluh Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	02°58'50.37"S	101°35'51.83"E

5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bunga Tanjung Estate	2,312.19	236.97	353.84	2,903.00	79.65
Air Bikuk Estate	1,074.62	176.97	11.38	1,410.00	86.64
Air Buluh Estate	2,170.79	257.17	72.04	2,500.00	86.83
Malin Deman Estate	631.76	133.49	412.75	1,178.00	53.63
Kebun Masyarakat Desa/KMD	224.24	0	0	224.24	100.00
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	135.10	4.41	0	139.51	96.84
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	164.40	3.35	0	167.75	98.00
Total	6,713.10	812.36	850.01	8,522.50	78.77

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bunga Tanjung Estate	0	0	1,441.95	870.24	0	2312.19	0

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Air Bikuk Estate	551.49	65.54	0	604.62	0	670.16	551.49
Air Buluh Estate	0	168.72	1845.71	156.36	0	2170.79	0
Malin Deman Estate	15.25	616.51				616.51	15.25
Kebun Masyarakat Desa/KMD	12.34	47.9	164	0	0	211.9	12.34
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	0	135.10	0	0	0	135.1	0
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	0	164.40	0	0	0	164.4	0
Total (ha)	579.08	1198.17	3451.66	1,631.22	0	6,281.05	579.08

Note:

*Replanting

**Only Mature area is considered as production area

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year			
	Estimated <i>(Feb 2019-Jan 2020)</i>	Actual		Forecast <i>(Feb 2020-Jan 2021)</i>
		<i>Previous license period (Nov 2018 - Jan 2019)</i>	<i>Current license period Feb 2019 – Oct 2019)</i>	
Bunga Tanjung Estate*	49,528.70	10,499.37	32,690.71	45,092.00
Air Bikuk Estate*	14,029.50	2,733.90	8,512.24	15,492.00
Air Buluh Estate*	53,880.90	11,137.49	34,677.55	48,914.00
Malin Deman Estate*	16,495.70	3247.71	10,112.03	16,806.78
Kebun Masyarakat Desa/KMD	4,673.80	638.11	1,986.81	4,650.00
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	3,705.50	879.52	2,738.47	4,341.60
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	3,478.90	699.53	2,178.04	3,245.40
Total	145,793.00	29,835.64	92,895.85	138,541.78
		Total: 122,731.49		

Note:

8. Certified Tonnage of FFB (from other certified unit(s) if applicable *

Estate	Tonnage / year			
	Estimated <i>(Feb 2019-Jan 2020)</i>	Actual		Forecast <i>(Feb 2020-Jan 2021)</i>
		<i>Previous license period (Nov 2018 - Jan 2019)</i>	<i>Current license period Feb 2019 – Oct 2019)</i>	
	N/A			N/A
0		0	0	
Total		0		

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Note:

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

Independent FFB Supplier	Tonnage / year			Forecast <i>(Feb 2020-Jan 2021)</i>
	Estimated <i>(Feb 2019-Jan 2020)</i>	Actual		
	N/A	<i>Previous license period (Nov 2018 - Jan 2019)</i>	<i>Current license period Feb 2019 – Oct 2019)</i>	N/A
0	0	0	0	0
Total	0	0		0

Note:

10. Certified Tonnage

Mill Capacity: 60 MT/hr SCC Model: IP	Estimated <i>(Feb 2019-Jan 2020)</i>	Actual		Forecast <i>(Feb 2020-Jan 2021)</i>
	FFB	FFB		FFB
		<i>Previous license period (Nov 2018 - Jan 2019)</i>	<i>Current license period Feb 2019 – Oct 2019)</i>	
	145,793.00	29,835.64	92,895.85	138,541.78
	CPO (OER: 23.5 %)	CPO (OER: 23.28%)		CPO (OER: 23%)
	33,532.39	28,571.88		31,864.6
	PK (KER:5.10 %)	PK (KER: 4.98%)		PK (KER: 5%)
	7,435.44	6,132.81		6,927.08

Note:

11. Actual Sold Volume (CPO)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	21,999.26	0	0	6,023.84	28,023.1

12. Actual Sold Volume (PK)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	1,050	0	0	4,219.06	5,269.06

13. Actual Group certification Claims

	Credit	Physical Volume (MT)
IS-CSPO	0	0
IS-CSPKO	0	0
IS-CSPKE	0	0

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Suite 29.01, Level 29,
The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site initial assessment was conducted from 11th – 16th November 2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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. RSPO Principles & Criteria Generic November 2018 was used to guide the collection of information to assess compliance and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held 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 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

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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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-certification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Bunga Tanjung POM	v	v	v	v	v
Bunga Tanjung Estate	v	v		v	v
Air Bikuk Estate		v		v	v
Air Buluh Estate	v		v	v	v
Malin Deman Estate			v	v	v
Kebun Masyarakat Desa/KMD	v	v	v	v	v
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	v			v	v
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)		v		v	v

Tentative Date of Next Visit: November 1, 2020 - November 8, 2020

Total No. of Mandays: 20

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Imam Fakhrurozi	Team Leader	Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011. He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2015. During this assessment, he assessed on the aspects of Social Aspect, Environmental aspect-impacts, Occupational Health and Safety.
Pratama Sedayu A.	Team Member	Graduated from University of Jenderal Soedirman on 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor endorsed Courses. During this assessment, he assessed on the aspects of legal, supply chain for CPO Mills, environment management system, HCV, smallholder audits and stakeholder consultation. He is fluent in both verbal/written in English.
Eko Purwanto	Team Member	Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB) in 2001. He has working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implementing good agricultural practice including integrated pest management and limited pesticides uses. He has completed lead auditor training courses for RSPO P&C (2013), ISO 9001:2008 (2012), ISO 14001:2004 (2013), ISPO (2012), and RSPO SCC (2012). He has also completed training course of ISO 14001 (2012), Minaut Indonesia (2011) and Introduction to HCV Toolkit HCV (2011). For the last 2 years, he has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in Indonesia Sustainable Palm Oil (ISPO) audit for several plantations and mills since October 2012. During this assessment, he assessed on the aspects of mill and estate best management practices and supply chain for CPO mills. He is fluent in both verbal/written in English.
Yudwi Wisnu Rahmanto	Team Member	Holds a Bachelor of Forestry with Silviculture background. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT Lead Auditor Course, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001 Auditor/Lead Auditor Course, ISO 14001, OHSAS

		18001 Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. During the assessment he assigned to verify Best Practices Management, GHG and Continual Improvement aspect. He is fluent in both verbal/written in English.
Nanang Muallib	Team Member	He holds a Bachelor degree in Forestry Technology from Bogor Agriculture University, 1999. He has 4 years experience worked in the Forest plantation company in Indonesia, and has experiences involves in the several RSPO certification audits as team member. He has passed 5 days ISO 9001 auditor training on 2009. He has been approved as an HCV Assessor under RSPO Scheme. He has been involved in many assessment related to the Forestry and Sustainable oil palm certification in Indonesia. He has experienced involves in RSPO certification assessments more than 15 different oil palm organizations (including mills and estates) in Indonesia. He has passed the RSPO Lead Auditor Training in 2017. During this assessment, he assessed on the aspect of Legal, HCV identification and management, and also social community engagement and stakeholder consultation as well as smallholder audits.

Accompanying Persons:

No.	Name	Role
Nil	Nil	Nil

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	IF	PS	EP	NM	YWR
			PRSCO LA- EMS, OHS	PRSCO SCC, SA	PRSCO LA, SA	PRSCO - SA	PRSCO LA, SA
Monday, 11/11/2019	Tim I						
	06.10-08.05	Flight Jakarta – Padang	-	√	-	-	-
	08.05-09.00	Travel to Agro Muko Tank Terminal (AMTT)	-	√	-	-	-
	09.00-14.00	Opening Meeting and Audit RSPO SCC at AMTT	-	√	-	-	-
	14.00-...	Travel to site PT Agromuko	-	√	-	-	-
	Tim II						
	06.10-08.05	Flight Jakarta – Bengkulu	√	-	√	√	√
	08.05-12.00	Travel to Air Buluh Estate	√	-	√	√	√
	14.00-14.30	Opening Meeting PT Agro Muko – Bunga Tanjung POM (location in Air Buluh Estate)	√	-	√	√	√
	14.30-17.00	Document Review - Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS) - Koperasi Perkebunan Air Buluh Agromuko (KOPABA)	√	-	√	√	√

Date	Time	Subjects	IF	PS	EP	NM	YWR
			PRSP LA- EMS, OHS	PRSP SCC, SA	PRSP LA, SA	PRSP - SA	PRSP LA, SA
Tuesday, 12/11/2019	08.00-12.00	Field visit: Air Buluh Estate - Harvesting, transport of FFB, spraying, fertilizer regime, IPM implementation and worker interview (best management practices). - pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (welfare, environmental, health and safety) - HGU pegs maintenance, HCV area, river, buffer zone	√	-	√	-	√
		Field visit and Interview: KMD Tanjung Harapan, KMD Bukit Harapan and KMD Mundam Marap (Air Buluh Estate)	-	-	-	√	-
		Field visit: Bunga Tanjung Mill (SCC)	-	√	-	-	-
	12.00-14.00	Break	√	√	√	√	
	14.00-17.00	Document Review: Air Buluh Estate and KMD RSPO P&C	√	√	√	√	√
Continue to SCC audit: Bunga Tanjung Mill		-	√	-	-	-	
Wednesday, 13/11/2019	08.00-12.00	Stakeholder Consultation: Interview with Stakeholders from Kabupaten Mukomuko: BPN, BLH, Dinas Tenaga Kerja, Dinas Perkebunan.	-	√	-	-	
		Field visit: Malin Deman Estate - Harvesting, transport of FFB, spraying, fertilizer regime, IPM implementation and worker interview (best management practices). - pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (welfare, environmental, health and safety) - HGU pegs maintenance, HCV area, river, buffer zone	√	√	√	-	-
		Field visit and Interview: Stakeholder interview (with surrounding village)	-	-	-	-	√
		Field visit and Interview: Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS) Koperasi Perkebunan Air Buluh Agromuko (KOPABA)	-	-	-	√	-
	12.00-14.00	Break	√	√	√	√	√
	14.00-17.00	Document Review: Malin Deman Estate and KMD RSPO P&C	√	√	√	√	√
	17.00-..	Travel to GMO	√	√	√	√	√
Thursday, 14/11/2019	08.00-12.00	Field visit: Air Bikuk Estate - Harvesting, transport of FFB, spraying, fertilizer regime, IPM implementation and worker interview (best management practices). - pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (welfare, environmental, health and safety) - HGU pegs maintenance, HCV area, river, buffer zone	√	√	√	-	-
		Field visit and Interview: Stakeholder interview (with surrounding village)	-	-	-	-	√
		Field visit and Interview: KMD Air Bikuk, KMD Air Berau, KMD Pondok Suguh (Bikuk Estate)	-	-	-	√	-

Date	Time	Subjects	IF	PS	EP	NM	YWR
			PRSCO LA- EMS, OHS	PRSCO SCC, SA	PRSCO LA, SA	PRSCO - SA	PRSCO LA, SA
	12.00-14.00	Break	√	√	√	√	√
	14.00-17.00	Document Review: Air Bikuk Estate and KMD RSPO P&C	√	√	√	√	√
Friday, 15/11/2019	08.00-12.00	Field visit: Bunga Tanjung Estate					
	12.00-14.00	- Harvesting, transport of FFB, spraying, fertilizer regime, IPM implementation and worker interview (best management practices).	√	√	√	-	-
	14.00-17.00	- pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (welfare, environmental, health and safety)					
		- HGU pegs maintenance, HCV area, river, buffer zone					
		Field visit and Interview: Stakeholder interview (with surrounding village)	-	-	-	-	√
		Field visit and Interview: KMD Pasar Bantal, KMD Nelan Indah (Bunga Tanjung Estate)	-	-	-	√	-
		Break	√	√	√	√	√
		Document Review: Air Bikuk Estate and KMD RSPO P&C	√	√	√	√	√
Saturday, 16/11/2019	08.00-12.00	File Visit and Document review: Bunga Tanjung Mill					
		- General information; time bound plan; partial certification verification; RSPO P&C (Management Plan); Palm Oil Mill's Best Management Practices, Social policy and implementation, Continual Improvement.	√	√	√	√	√
		- RSPO P&C (Health and Safety, Environmental Management System, Waste management system, Continual Improvement, Use of Renewable Energy, GHG Calculation).					
		- EMS, EFB, WWTP, emissions, diesel tanks, fire extinguishers, clinic, first aiders and boxes, workshop, storage, etc.					
		- Mill process from incoming FFB to CPO storage tank, PK silo, PPE use, safe working environment, walk ways, signs, etc.					
		- Interview with workers					
	12.00-14.00	Break/Lunch	√	√	√	√	√
	14.00-14.30	Auditor Discussion	√	√	√	√	√
	14.30-15.00	Closing Meeting	√	√	√	√	√
	15.00..	Travel to Bengkulu	-	-	-	-	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- SIPEF Group Multiple Management Units / Time Bound Plan
- RSPO P&C Generic November 2018
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	PT Agro Muko – Mukomuko Palm Oil Mill is a subsidiary of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Not all the estates and mills certified within five years after obtaining RSPO membership. New estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	The latest acquisition noted for PT. Asri Rimba Wirabhakti in Bengkulu, announced end of 2018. Certification plan have been prepared, awaiting for RSPO LUC, RSPO RACP and RSPO NPP.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is changes from the last audit to include PT. Asri Rimba into timebound plan. Waiting for HCV ALS review, LUC review for preparation into RSPO NPP.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapse. SIPEF is able to demonstrate adequate evidence related to changes in implementation of the plan.	Yes
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	The delay of not able to certify all the estate within the 5 years period from the day of RSPO membership is accepted by the assessment team.	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in 	Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note "The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the	Yes

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<p>accordance with RSPO P&C criterion 7.3.</p>	<p>Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015”.</p>	
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All new planting after January 1st, 2010 have undergone and complies with RSPO New Planting Procedure.</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p>	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>On 18 June 2018 – Complaint Panel to deliver a decision.</p> <p>On 25 July 2018 – Complaint Panel to deliver a decision.</p> <p>On 23 August 2018 – Draft decision letter to be reformatted.</p> <p>On 19 September 2018 – Decision Letter – Complaints Panel.</p> <p>On 26 September 2018 – The decision letter finalised and to be delivered to Parties.</p> <p>On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018.</p> <p>On 20 December 2018 – The complaint is officially closed.</p> <p>The case tracker available on link</p>	<p>Yes</p>

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	https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labor dispute noted. The assessment team has conducted a search in internet to confirm that there is no new comments or dispute raised by the communities on those units that have not been certified.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance noted. The assessmentteam has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	The internal audit against the uncertified management units requirement has been conducted for all uncertified units: <ul style="list-style-type: none"> • PT. Agro Rawas Ulu was conducted on 20-21 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Kati Lama was conducted on 4-6 March 2019 assessing criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Muara Rupit was conducted on 18-20 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; Each company provide correction and corrective action on the base to ensure all RSPO P&C requirements are implemented.	Yes
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholder comments are noted. The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case Tracker; raised by the individual on those units that have not been certified. RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker: On 25 July 2017 - Secretariat to write to the company and inform them on the complaint. On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.	Yes

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	<p>On 28 August 2017 - Secretariat received response from the company. On 5 September 2017 - Complainant failed to provide the document. On 11 September 2017 - Secretariat has sent an email to SIPEF. On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter. On 18 June 2018 – Complaint Panel to deliver a decision. On 25 July 2018 – Complaint Panel to deliver a decision. On 23 August 2018 – Draft decision letter to be reformatted. On 19 September 2018 – Decision Letter – Complaints Panel. On 26 September 2018 – The decision letter finalised and to be delivered to Parties. On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018. On 20 December 2018 – The complaint is officially closed. The case tracker available on link https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</p>	
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3.3 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>Yes. PT Agro Muko – Mukomuko POM put all of the smallholder into certification.</p>	<p>Comply</p>

3.4 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the Annual Surveillance Assessment (ASA) 1_4 there were 0 Major, 2 Minor nonconformities and 3 (three) Opportunities for Improvement requiring attention were identified.

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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 Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly.

Non-conformity			
NCR Ref #	1853924-201911-N1	Clause & Category (Major / Minor)	RSPO P&C Generic Nov 2018 indicator 2.2.2 (Minor)
Date Issued	16 November 2019	Due Date	Next Audit
Closed (Yes / No)	No	Date of nonconformity Closure	Next Audit
Statement of Nonconformity:	The contracts between PT. Agro Muko and the KMD (scheme smallholder), and CPO transporters have not contain specific clauses on meeting applicable legal requirements.		
Requirement Reference:	RSPO P&C Generic Nov 2018 indicator 2.2.2 (minor) All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.		
Objective Evidence:	<p>KMD Nelan Indah: "Perjanjian Pemborongan Pekerjaan No: 01/TRPT-NI/KMD/IX/2019, dated 1 September 2019". Contractor for KMD's only for FFB transportation from KMD block to Bunga Tanjung POM. This contract between Village Nelan Indah and BUMDES Nelan Sejahtera. Within this contract was not contain clause on meeting applicable legal requirements.</p> <p>KMD Bantal: "Perjanjian Pemborongan Pekerjaan No: 02/TRPT-PB/KMD/IX/2019, dated 1 September 2019". Contractor for KMD's only for FFB transportation from KMD block to Bunga Tanjung POM. This contract between Village Pondok Baru (including Pasar Bantal) and CV. Dimas Putra. Within this contract was not contain clause on meeting applicable legal requirements.</p> <p>Bunga Tanjung POM: Based on document review upon contracts for CPO transporters: CV. Usaha Jaya, PT. Genta Perdana Diandra, PT. Bersama Sejahtera Mandiri and PT. Mutia Mulia - there was no specific clauses on meeting applicable legal requirements.</p>		
Corrections:	<ul style="list-style-type: none"> Put the specific clauses on meeting applicable legal requirements into all contracts. Carried out contract addendum to all contract that has not included specific clauses on meeting applicable legal requirements. 		
Root Cause Analysis:	Indicator that specified requirement to include specific clauses on meeting applicable legal requirements was a new indicator, therefore the Operation Unit does not aware yet.		
Corrective Actions:	<p>Management of PT Agro Muko through RMO issues a circular to ensure that specific clauses on meeting applicable legal requirements are included into all contracts, including but not limited to KMDs contract and transport contract.</p> <p>Target date:</p> <ul style="list-style-type: none"> For new contract, the specific clauses on meeting applicable legal requirements included during contract drafting. For existing contract, addendum of contract completed not later than 1st Semester of 2020. <p>PIC:</p>		

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	All OU Head.
Assessment Conclusion:	Audit team has reviewed and accepted the corrective action plan prepared by the Unit of Certification. The effectiveness of corrective actions will be verified during next surveillance assessment.

Non-conformity			
NCR Ref #	1853924-201911-N2	Clause & Category (Major / Minor)	RSPO P&C Generic Nov 2018 indicator 2.2.3 (Minor)
Date Issued	16 November 2019	Due Date	Next Audit
Closed (Yes / No)	No	Date of nonconformity Closure	Next Audit
Statement of Nonconformity:	The contracts between PT. Agro Muko and KMD (scheme smallholder as FFB supplier), and CPO transporters have not contain clauses disallowing child, forced and trafficked labour.		
Requirement Reference:	RSPO P&C Generic Nov 2018 indicator 2.2.3 (minor) All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.		
Objective Evidence:	<p>Air Buluh Estate: Surat Perjanjian Kerja No. 205/ABE/RMO-AM/2019, dated 30 August 2019. This contract between PT. Agro Muko and CV. Lisana Rollis Jabenk, assignment job: Repairing Housing, Warehouse, Mosque and Kindergarten at Air Buluh Estate. Clause 4: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. Within this contract was not contain clause disallowing forced and trafficked labour.</p> <p>Malin Deman Estate: Perjanjian Pemborongan Pekerjaan No: 01/KSU-MMAS/PPTK-FL/I/2019, dated 1 January 2019. This contract between PT. Muko Muko Agro Sejahtera and Koperasi Serba Usaha Agro Muko (KSU-AM), assignment job Upkeep and Maintenance. This contract contain disallowing child labour (Clause/Pasal 8), follow applicable law and regulation (Clause/Pasal 3). Within this contract was not contain clause disallowing forced and trafficked labour</p> <p>KMD Nelan Indah: "Perjanjian Pemborongan Pekerjaan No: 01/TRPT-NI/KMD/IX/2019, dated 1 September 2019". Contractor for KMD's only for FFB transportation from KMD block to Bunga Tanjung POM. This contract between Village Nelan Indah and BUMDES Nelan Sejahtera. Within this contract was not contain clause disallowing child, forced and trafficked labour.</p> <p>Bunga Tanjung Estate: Surat Perjanjian Kerja SPK No. 182/BTE/RMO-AM/2019, dated 13 June 2019. This contract between PT. Agro Muko and UD. Simpang Pabrik, assignment job: Construction of warehouse and fire fighting resources. In Clause 4 "Pelaksanaan Pekerjaan", point 5 only stated shall comply with Employment Law, disallowing child labour, disallowing paid under required minimum wage, paying attention to OHS and Environmental. This contract was not contain disallowing forced and</p>		

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	<p>trafficked labour.</p> <p>Bunga Tanjung POM: Based on document review upon contracts for CPO transporters: CV. Usaha Jaya, PT. Genta Perdana Diandra, PT. Bersama Sejahtera Mandiri and PT. Mutia Mulia - there was no clauses disallowing child, forced and trafficked labour.</p>
Corrections:	<ul style="list-style-type: none"> Put the clauses on disallowing child, forced and trafficked labour into all contracts. Carried out contract addendum to all contract that has not included clauses on disallowing child, forced and trafficked labour.
Root Cause Analysis:	Indicator that specified requirement to include clauses on disallowing child, forced and trafficked labour was a new indicator, therefore the Operation Unit does not aware yet.
Corrective Actions:	<p>Management of PT Agro Muko through RMO issues a circular to ensure that specific clauses on meeting applicable legal requirements are included into all contracts, including but not limited to KMDs contract and transport contract.</p> <p>Target date:</p> <ul style="list-style-type: none"> For new contract, the clauses on disallowing child, forced and trafficked labour included during contract drafting. For existing contract, addendum of contract completed not later that 1st Semester of 2020. <p>PIC: All OU Head.</p>
Assessment Conclusion:	Audit team has reviewed and accepted the corrective action plan prepared by the Unit of Certification. The effectiveness of corrective actions will be verified during next surveillance assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>RSPO P&C Generic Nov 2018 indicator 6.2.4</p> <p>The Certification Unit has done periodic inspection in monthly basis regarding employee housing using Form ENC/CHK/06 (Emplasmnt Inspection Checklist), consist of inspection to the Building, Facility, Cleanliness and Prevention of Pollution), House Keeping, Health and Safety, Emergency First Response dan Electricity Equipment. Point of consideration on coverage of points recommended in ILO Guidance on Workers' Housing Recommendation No 115 in the form ENC/CHK/06 (Emplacement Inspection Checklist).</p>
OFI 2	<p>RSPO P&C Generic Nov 2018 indicator 6.5.3</p> <p>Based on interview with Gender Committee and female worker, stated that the certification unit has policy to give opportunities to the breastfeeding woman to breastfeed their child during working hour at 10.00, this policy has been included in Collective Labor Agreement 2018-2020 as well. Based in interview, the policy regarding breastfeeding time has been implemented. Point of consideration on policy evaluation taking into account voice from new mothers and breastfeeding women by involving Gender Committee.</p>
OFI 3	<p>RSPO P&C Generic Nov 2018 indicator 6.7.2</p> <p>The Unit of Certification has completed Emergency Response Facility for land fire provided per 2 (two) estates. Point of consideration on improved the emergency response team's (Satgas Pengendalian</p>

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	Kebakaran Lahan Perkebunan) understanding on instruction to use emergency response equipment.
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Positive Findings	
PF #	Description
-	-

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	Nil	Clause & Category (Major / Minor)	
Closed (Yes / No)		Date of nonconformity Closure	
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
CR01	Minor		01/10/2010	10/02/2012
CR02	Minor		01/10/2010	10/02/2012
A675812/1	Major		10/02/2012	10/02/2012
A675812/1	Minor		10/02/2012	01/02/2013
A675812/2	Minor		10/02/2012	01/02/2013
A675812/3	Minor		10/02/2012	01/02/2013
A675812/4	Minor		10/02/2012	01/02/2013
A675812/5	Minor		10/02/2012	01/02/2013
463917-1	Minor	RSPO P&C INA-WG 2008 4.7.7	01/02/2013	08/01/2014
463917-2	Minor	RSPO P&C INA-WG 2008 6.5.3	01/02/2013	08/01/2014
1010903M3	Major	RSPO P&C INA-WG 2008 2.1.1	08/01/2014	06/03/2014
1010903M7	Major	RSPO P&C INA-WG 2008 4.7.1	08/01/2014	06/03/2014
1010903M10	Major	RSPO P&C INA-WG 2008 4.8.2	08/01/2014	06/03/2014
1010903M16	Major	RSPO P&C INA-WG 2008 6.10.1	08/01/2014	06/03/2014
1010903M18	Major	RSPO SCCS 2011 D.3.4	08/01/2014	06/03/2014
1010903N1	Minor	RSPO P&C INA-WG 2008 2.1.4	08/01/2014	25/11/2014
1010903N6	Minor	RSPO P&C INA-WG 2008 4.6.5	08/01/2014	25/11/2014
1010903N8	Minor	RSPO P&C INA-WG 2008 4.7.5	08/01/2014	25/11/2014
1010903N9	Minor	RSPO P&C INA-WG 2008 4.7.10	08/01/2014	25/11/2014
1010903N13	Minor	RSPO P&C INA-WG 2008 5.3.4	08/01/2014	25/11/2014

1010903N15	Minor	RSPO P&C INA-WG 2008 5.5.4	08/01/2014	25/11/2014
1420737M1	Major	RSPO P&C INA-NI 2016 4.7.1	17/12/2016	02/02/2016
1420737N1	Minor	RSPO P&C INA-NI 2016 4.4.1	17/12/2016	07/12/2017
1420737N2	Minor	RSPO P&C INA-NI 2016 5.1.3	17/12/2016	07/12/2017
1563740-201712-M1	Major	RSPO P&C INA-NI 2016 1.2.1	07/12/2017	Closed on 22/01/2018
1563740-201712-M2	Major	RSPO P&C INA-NI 2016 2.1.1	07/12/2017	Closed on 22/01/2018
1563740-201712-M3	Major	RSPO P&C INA-NI 2016 4.7.1	07/12/2017	Closed on 22/01/2018
1563740-201712-M4	Major	RSPO P&C INA-NI 2016 5.1.1	07/12/2017	Closed on 22/01/2018
1563740-201712-M5	Major	RSPO P&C INA-NI 2016 6.2.1	07/12/2017	Closed on 22/01/2018
1563740-201712-M6	Major	RSPO P&C INA-NI 2016 6.3.1	07/12/2017	Closed on 22/01/2018
1563740-201712-M7	Major	RSPO P&C INA-NI 2016 6.4.1	07/12/2017	Closed on 22/01/2018
1563740-201712-M8	Major	RSPO P&C INA-NI 2016 6.8.1	07/12/2017	Closed on 22/01/2018
1563740-201712-M9	Major	RSPO P&C INA-NI 2016 6.9.1	07/12/2017	Closed on 22/01/2018
1563740-201712-M10	Major	RSPO P&C INA-NI 2016 6.9.2	07/12/2017	Closed on 22/01/2018
1563740-201712-M11	Major	RSPO P&C INA-NI 2016 6.13.1	07/12/2017	Closed on 22/01/2018
1563740-201712-M12	Major	RSPO P&C INA-NI 2016 7.6.2	07/12/2017	Closed on 22/01/2018
1563740-201712-N1	Minor	RSPO P&C INA-NI 2016 1.1.1	07/12/2017	Closed on 06/12/2018
1563740-201712-N2	Minor	RSPO P&C INA-NI 2016 1.3.1	07/12/2017	Closed on 06/12/2018
1563740-201712-N3	Minor	RSPO P&C INA-NI 2016 2.1.2	07/12/2017	Closed on 06/12/2018
1563740-201712-N4	Minor	RSPO P&C INA-NI 2016 2.1.3	07/12/2017	Closed on 06/12/2018
1563740-201712-N5	Minor	RSPO P&C INA-NI 2016 2.1.4	07/12/2017	Closed on 06/12/2018
1563740-201712-N6	Minor	RSPO P&C INA-NI 2016 5.1.2	07/12/2017	Closed on 06/12/2018
1563740-201712-N7	Minor	RSPO P&C INA-NI 2016 5.1.3	07/12/2017	Closed on 06/12/2018
1563740-201712-N8	Minor	RSPO P&C INA-NI 2016 6.2.2	07/12/2017	Closed on 06/12/2018
1563740-201712-N9	Minor	RSPO P&C INA-NI 2016 6.2.3	07/12/2017	Closed on 06/12/2018
1563740-201712-N10	Minor	RSPO P&C INA-NI 2016 6.4.2	07/12/2017	Closed on 06/12/2018
1563740-201712-N11	Minor	RSPO P&C INA-NI 2016 6.9.3	07/12/2017	Closed on 06/12/2018
1853924-201911-N1	Minor	RSPO P&C Generic 2018 2.2.2	16/12/2019	Open
1853924-201911-N2	Minor	RSPO P&C Generic 2018 2.2.3	16/12/2019	Open

3.5. Stakeholders Consultation

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace 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 below.

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List of Stakeholders contacted	
Internal Stakeholders <ul style="list-style-type: none"> Workers of PT Agromuko – Bunga Tanjung POM Gender Committee of PT Agro Muko 	Union/Contractors <ul style="list-style-type: none"> PT MPUM (Land Clearing Contractor) Tanah Rekah Estate PT SSI – Security Contractor Village Head of Village of Bukit Harapan, Village of Pasar Bantal, Sub-District of Teraman Jaya Labor Union (SPAM)
Government Departments <ul style="list-style-type: none"> Dinas Pertanian, Bidang Perkebunan - Kabupaten Mukomuko (Plantation Office) Dinas Lingkungan Hidup – Kabupaten Mukomuko (Environmental Office) Kantor Pertanahan, Badan Pertanahan Nasional – Kabupaten Mukomuko (Land Office) Dinas Penanaman Modal, Pelayanan Terpadu Satu Pintu dan Tenaga Kerja – Kabupaten Mukomuko (Manpower Office) 	NGO Jaringan Pendamping Kebijakan Pembangunan (JPKP)

No.	Stakeholders comment
1	<p>Feedbacks:</p> <p>Dinas Pertanian - Kabupaten Mukomuko (Plantation Office)</p> <ul style="list-style-type: none"> PT Agro Muko and PT Mukomuko Agro Sejahtera have comply to all permit requirements. PT Agro Muko and PT Mukomuko Agro Sejahtera have been cooperative in providing of data and information requested, communication has been running well. Agriculture – Plantation Office has receive routine reports from PT Agro Muko and PT Mukomuko Agro Sejahtera related “Laporan Perkembangan Usaha Perkebunan” (Plantation Business Development Report) in 3 monthly basis. PT Agro Muko and PT Mukomuko Agro Sejahtera helped the government to improve the community’s social and economic level, one of which is the use of KMD. STD-B registration for KMD is a government obligation. The registration requirements have been fulfilled by KMD, assisted by PT Agro Muko. At present it is still in the processing stage, and field verification will soon be carried out - with the target of issuance before 2019 ends. PT Agro Muko is active in attending the meeting of FFB purchase pricing. The FFB purchase price applied by PT Agro Muko is above the government stipulated price. Purchase result and value are delivered by PT Agro Muko in mass media. As far as the Agriculture Office is concerned - the HGU of PT Agro Muko in process. There was input from the community to request a portion of the land and be excluded from the scope of the HGU. The Department of Agriculture has provided dissemination (in its capacity as regulator) that in accordance with the Minister of Agriculture Regulation, the company's obligation is to facilitate plasma (smallholder) development for the community. <p>Management Responses:</p> <ul style="list-style-type: none"> Thank you for the confirmation from the Mukomuko Regency Agriculture Office regarding all licensing requirements of PT Agro Muko and PT Mukomuko Agro Sejahtera have all been fulfilled. Thank you for the confirmation from the Mukomuko Regency Agriculture Office that stated PT Agro Muko and PT Mukomuko Agro Sejahtera were cooperative in providing the requested data

	<p>and information and communication went well.</p> <ul style="list-style-type: none"> • Thank you for the confirmation from the Mukomuko Regency Agriculture Office regarding submission of Plantation Business Development Report in 3 monthly basis. • Thank you for the confirmation from the Mukomuko Regency Agriculture Office regarding PT Agro Muko dan PT Mukomuko Agro Sejahtera have helped the government to improve the community's social and economic level, one of which is the use of KMD. • PT Agro Muko will follow up to Agriculture Agency of Mukomuko Regency regarding field verification related to registration of STD-B KMD. • PT Agro Muko receives invitation from the Bengkulu Provincial Plantation Office for the meeting of FFB Purchase Determination and PT Agro Muko is always present to attend the meeting of FFB Purchase Determination in Bengkulu Province. • It is true that PT Agro Muko has proposed an extension for the HGU which expires in 2019, that is HGU No.31/HGU/BPN/89 dated 27 June 1989. Covers area of 10,000 ha consisting of 2 HGU certificates: Certificate No.2/MU covering 2,270 Ha and Certificate No.03 covering 7,730 Ha. There are several groups from the community asking for a portion of the land to be excluded from the scope of the HGU, it has been disseminated that the company's obligation is to facilitate plasma (smallholder) development for the community rather than give away the portion of HGU. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> • Audit team noted the positive comments from Mukomuko Regency Agriculture – Plantation Office for PT Agro Muko. • Audit team noted that PT Agro Muko was in process of for HGU extension.
<p>2</p>	<p>Feedbacks:</p> <p>Dinas Lingkungan Hidup – Kabupaten Mukomuko (Environment Office)</p> <ul style="list-style-type: none"> • Communication between Environmental Office and PT Agro Muko / PT Mukomuko Agro Sejahtera are running well. • PT Agro Muko has fulfilled the Environmental Permit requirements. • PT Mukomuko Agro Sejahtera has fulfilled the requirements of the Environmental Permit in the framework of plans to increase the scope (accommodate the acquisition of PT Asri Rimba). • Environmental reports of PT Agro Muko and PT Mukomuko Agro Sejahtera are routinely delivered. Data, information and results of measurement parameters and quality standards have been met. • Based on compliance review, the company fulfills the specified parameters and environmental quality standards. • PT Agro Muko already has a Liquid Waste Disposal Permit; permit reports are submitted periodically. • PT Agro Muko already has a Hazardous Waste temporary storage permit for 10 points; reports on the permit, management and documentation of the Hazardous Waste temporary storage permit are submitted periodically. • Meeting environmental requirements for outpatient clinics at PT Agro Muko works well, according to environmental requirements. • PT Agro Muko and PT Mukomuko Agro Sejahtera has registered for a Domestic Waste Permit covering 12 locations. • PT Agro Muko and PT Mukomuko Agro Sejahtera reports the status of forest and land fire patrol periodically. • Related to the availability and quality of water (effect of long drought); Until now the Environment Office has not received a request for Temporary Water Taking Permit from PT Agro Muko. • For KMD and Plasma, PT Agro Muko and PT Mukomuko Agro Sejahtera has reported environmental performance, according to SPPL. <p>Management Responses:</p> <ul style="list-style-type: none"> • Confirm that communication between Environmental Office and PT Agro Muko / PT Mukomuko Agro Sejahtera are running well. • Confirm that PT Agro Muko has fulfilled the Environmental Permit requirements. • Confirm that PT Mukomuko Agro Sejahtera has fulfilled the requirements of the Environmental Permit in the framework of plans to increase the scope (accommodate the acquisition of PT Asri

	<p>Rimba).</p> <ul style="list-style-type: none"> • Confirm that environmental reports of PT Agro Muko and PT Mukomuko Agro Sejahtera are routinely delivered. Data, information and results of measurement parameters and quality standards have been met. • Confirm that the company fulfills the specified parameters and environmental quality standards. • Confirm that PT Agro Muko already has a Liquid Waste Disposal Permit; permit reports are submitted periodically. • Confirm that PT Agro Muko already has a Hazardous Waste temporary storage permit for 10 points; reports on the permit, management and documentation of the Hazardous Waste temporary storage permit are submitted periodically. • Confirm that the company has meeting environmental requirements for outpatient clinics at PT Agro Muko works well, according to environmental requirements. • Confirm that PT Agro Muko and PT Mukomuko Agro Sejahtera has registered for a Domestic Waste Permit covering 12 locations. • Confirm that PT Agro Muko and PT Mukomuko Agro Sejahtera reports the status of forest and land fire patrol periodically. • Confirm that until now PT Agro Muko has not propose request for Temporary Water Taking Permit to the Environment Office. • Confirm that for KMD and Plasma, PT Agro Muko and PT Mukomuko Agro Sejahtera has reported environmental performance, according to SPPL. • Management of PT Agro Muko appreciates the acknowledgement/positive comments from Environmental Office related to environmental performance of the company. • PT Agro Muko thanks the Environmental Office for the supervision.
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> • Audit team noted the positive comments from Mukomuko Regency Environment Office for PT Agro Muko. • Audit team noted that information request from Mukomuko Regency Environment Office have been fulfilled.
<p>3</p>	<p>Feedbacks: Kantor Badan Pertanahan Nasional – Kabupaten Mukomuko (Land Office)</p> <ul style="list-style-type: none"> • PT Agro Muko is in the process of HGU extension - based on monitoring in the system, the process is in Committee B. • Decree of HGU of PT Mukomuko Agro Sejahtera has been issued by the Central BPN, a certificate of HGU has been issued. • BPN received information on public complaints in 2017 from the community of Air Dikit District related to the allegation that the village treasury land was included in the HGU and the community requested that 20% of the HGU be excluded for the benefit of the community. The complaint information was forwarded to the BPN Regional Office, Bengkulu Province. • BPN received information indicating the presence of HGU land occupation in Danau Lebar, adjacent to Setia Budi Village. • Some time ago there was an audiency with the community, where BPN received community input to be submitted to the company to build a Palm Oil Mill in the Air Rami / Malin Deman area, so that the community did not sell FFB too far. This is also taken into consideration for the BPN to consider changes, and wait for a decision regarding the Mukomuko Regency Spatial Palnning (RTRW). • KMD Bukit Harapan has submitted requirements for registration of land rights (certificate) No.13057/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL). • KMD Tanjung Harapan has submitted requirements for registration of land rights (certificate) No.13056/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL). • KMD Mundam Marap has submitted requirements for registration of land rights (certificate) No.13104/2019 - The BPN team conducted a field verification on 11 November 2019, in the review

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	<p>process (routine PTSL).</p> <ul style="list-style-type: none"> • BPN asks PT Agro Muko and PT Mukomuko Agro Sejahtera to submitted a report on the use of HGU (production area, infrastructure area, conservation area, area occupied by the community) - no specific format, can be submitted through the Plantation Business Development Report to the Agriculture Office. BPN should be provided 2 copies of the report. • BPN asks PT Agro Muko and PT Mukomuko Agro Sejahtera to provides reports and information on companies that are 1 group; further requires the company to provide SHP files for the purpose of measurement, monitoring and prevention - if there is a registration of user rights / ownership rights for land that has been charged with land rights / HGU (preventing overlapping / land grabbing).
	<p>Management Responses:</p> <ul style="list-style-type: none"> • Confirm that PT Agro Muko has proposed an extension for the HGU which expires in 2019, that is HGU No.31/HGU/BPN/89, dated 27 June 1989. The HGU area covers 10,000 Ha consist of 2 HGU certificates: Certificate No.2/MU covering 2,270 Ha and Certificate No.03 covering 7,730 Ha. • Confirm that HGU Decree of PT Mukomuko Agro Sejahtera has been issued by the Central BPN, a HGU certificate has been issued. • Information from a group of Air Dikit Districts communities related to the allegation that the village treasury land is included in the company's HGU are incorrect. Related to the community requesting 20% of the HGU be excluded for the benefit of the community, the Company applies the Plasma (Smallholder) scheme that in accordance with the applicable rules and regulations, which is comply to Permentan No.98/2013 concerning Plantation Business Licensing (IUP). The company has fulfilled the obligation to facilitate the construction of community plantations of at least 20% of the IUP-B or IUP area, stated in Article 15 Paragraph (2) that the community planttaion that facilitated by the company shall be outside of the IUP-B or IUP area. So there is no provision that requires companies to give away 20% of the HGU area to the community. At present the company has managed a lot of land that is provided by the community to be used as a Plasma (smallholder) plantation. • The company willing to communicates to LCA and GIS regarding land occupation in HGU area at Danau Lebar, near Setia Budi Village. • Currently PT Agro Muko has 2 (two) Palm Oil Mills located in Teras Terunjam District and Teramang Jaya District which have covered all PT Agro Muko area, so that input from the community to build a Palm Oil Mill in Air Rami / Malin Deman area cannot be programmed by the company. • Confirm that KMD Bukit Harapan has submitted requirements for registration of land rights (certificates) No.13057/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL). • Confirm that KMD Tanjung Harapan has submitted requirements for registration of land rights (certificate) No.13056/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL). • Confirm that KMD Mundam Marap has submitted requirements for registration of land rights (certificate) No.13104/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL). • The company regularly send the Plantation Business Development Report to the Agriculture Service to the Provincial and District Agriculture Services and the company will forward it to the BPN in the next reporting period. • The entire area of PT Agro Muko and PT Mukomuko Agro Sejahtera has been measured by the Central BPN Team by issuing a Land Plane Map, so that the SHP file should already be available at BPN for measurement, monitoring and prevention purposes - if there is a registration of a usufruct / ownership rights for land that has been charged with land rights / HGU (preventing overlapping / land grabbing).
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> • Audit team noted the positive comments from Mukomuko Regency Land Office for PT Agro Muko and PT Mukomuko Agro Sejahtera. • The process of HGU extension has been performed by the company and accepted by Land Office of Mukomuko Regency. Field verification has been done in 2017. Land Office of Mukomuko Regency

	<p>has submit letter to the Land Office of Bengkulu Province No.405/100-17.16/IX/2019 dated 20 September 2019, regarding proposal for extension of HGU No.02/MU covers 2,269.3205 Ha located in District of V Koto, Teras Terunjam and Selagan Raya; and letter No.450/100-17.16/X/2019 dated 23 October 2019, regarding proposal for extension of HGU No.03 covers 7,730 Ha located in District of Air Dikit, Teras Terunjam, Penarik and Selagan Raya. It also available letter from Land Office of Bengkulu Province to Miniters of Agraria and Spatial (Chairman of National Land Office) No.1363/SP-300.HP.01/X/2019 dated 31 October 2019, comprise all required document for HGU extension. Regarding this HGU extention which is still in process, the Company has obtained recommendation letter from Regent of Mukomuko Regency to continue investation and operational activities, based on letter No.750/389/A.1/XII/2019 dated 14 December 2019.</p> <ul style="list-style-type: none"> Auditor noted that the unit of certification will forward Plantation Business Development Report to the BPN in the next reporting period.
4	<p>Feedbacks: Dinas Penanaman Modal, Pelayanan Satu Pintu dan Tenaga Kerja – Kabupaten Mukomuko</p> <ul style="list-style-type: none"> PT Agro Muko and PT Mukomuko Agro Sejahtera has paid wages according to the minimum wage regulations. Representative of PT Agro Muko actively participates in the activities of the Provincial Wages Council. PT Agro Muko and PT Mukomuko Agro Sejahtera has provided facilities to accommodate employees' normative rights: housing, health clinics and medical personnel, houses of worship, aid for teaching staff, and sports facilities. PT Agro Muko and PT Mukomuko Agro Sejahtera has registered workers with the BPJS (medical and social insurance). Manpower Office confirms based on reports that there is no use of child labor. Implementation of occupational health and safety (K3) regulations in PT Agro Muko and PT Mukomuko Agro Sejahtera is going well. Regarding the inspection/supervision of OHS norms, registration of OHS licenses and permits, registration of the OHS supervisory committee and reporting of OHS performance is carried out by the Bengkulu Province Manpower Office. PT Agro Muko has registered the SPAM (Workers Union) to the Mukomuko Regency Manpower Office. The Manpower Office had received complaints regarding industrial relations cases in Tanah Rekah Estate. The case related termination of industrial relations was reported to the National Human Rights Commission. The Manpower Office suggest that PT Agro Muko can provide additional School Bus fleet so that school children do not crammed into the Bus, which can increase the risk of traffic accidents. <p>Management Responses:</p> <ul style="list-style-type: none"> Confirm that PT Agro Muko and PT Mukomuko Agro Sejahtera has paid wages according to the minimum wage regulations Confirm that PT Agro Muko actively participates in the activities of the Provincial Wages Council. Confirm that PT Agro Muko and PT Mukomuko Agro Sejahtera has provided facilities to accommodate employees' normative rights: housing, health clinics and medical personnel, houses of worship, aid for teaching staff, and sports facilities. PT Agro Muko and PT Mukomuko Agro Sejahtera has registered workers with the BPJS (medical and social insurance). Confirm that PT Agro Muko does not use child labor Confirm that the implementation of occupational helath and safety (K3) regulations in PT Agro Muko and PT Mukomuko Agro Sejahtera is going well. Confirm that inspection/supervision of OHS norms, registration of OHS licenses and permits, registration of the OHS supervisory committee and reporting of OHS performance is carried out by the Bengkulu Province Manpower Office. Confirm that PT Agro Muko has registered SPAM (Workers Union) to the Manpower Office. Complaints related to industrial relations cases in Tanah Rekah Estate have been resolved through

	<p>mediation with Bengkulu Province Manpower Office and Komnasham (National Human Rights Commission) in August 2019, in accordance with the Deed of Evidence of Registering a Collective Agreement through the Bipartite that was signed by the Registrar of PHI at District Court of Bengkulu on 25 August 2019</p> <ul style="list-style-type: none"> In 2019, PT Agro Muko has provided additional School Bus fleet 2 (two) units for Mukomuko Estate and 1 (one) unit for Tanah Rekah Estate, so that school children are not crammed into the Bus. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> Audit team noted the positive comments from Mukomuko Regency Manpower Office for PT Agro Muko and PT Mukomuko Agro Sejahtera. Audit team noted that the unit of certification has solved issues related industrial relations. Audit team noted that the unit of certification has receive and implemented suggestion from Manpower Office, especially related School Bus provision.
<p>5</p>	<p>Feedbacks:</p> <p>NGO Jaringan Pendamping Kebijakan Pembangunan (JPKP)-Mukomuko (Yon Saputra – Ketua DPD JPKP) and Customary Leader of Air Dikit Village (Mr. Samsuar)</p> <ul style="list-style-type: none"> The process of extending HGU has not yet ask for approval from the surrounding community. The community of 4 villages (Air Dikit, Pondok Lunang, Dusun V Koto and Sari Bulan) requested that the company allocate 20% of the HGU area extended to be to be given to the community for plasma (smallholder) plantation. JPKP has sent a letter to the President of Republic of Indonesia regarding objections to the extension of one of PT Agro Muko's HGUs which will expire on 31 December 2019. Air Dikit Village already has a Village Community Plantation (KMD) where the land used as KMD is provided by the Village. Replanting work in PT Agro Muko is indicated using contractors from Mukomuko Regency officials. The company must immediately carry out an action plan for the management of HCV. There are indications of HCV management that is not in accordance with conservation concepts such as the construction of roads at riparian and planting oil palm in areas that have been designated as HCV such as the coastline of Tanah Rekah Estate. The company does not want to receive FFB yields from community plantations. Absorption of local labor is felt to be very lacking. There is a report on a piece rate system where wages are paid based on workforce performance and if the achievement is less than the target due to natural constraints (rain etc.) the company does not pay the workforce based on daily wages. <p>Management Responses:</p> <ul style="list-style-type: none"> The process of extending the HGU of PT Agro Muko has followed the regulations and requirements set by the Government of the Republic of Indonesia, namely Permen ATR/BPN No. 7/2017 concerning Regulations and Procedures for Establishing Concession Rights. According to Permen ATR/BPN No. 7/2017 Part Two regarding Procedures for Extending the HGU Period, and Annex 1, is not required a surrounding community approval for Extension or Renewal of HGU Period. The company has also received a statement from the Village Head and/or Sub-District Head that the HGU area to be extended is not in cross-dispute and is physically controlled by the company continuously. The company's program of Plasma (smallholder scheme) is in accordance with the applicable rules and regulations, Permentan No. 98/2013 concerning Plantation Business Licensing (IUP). The Company has been comply to facilitate the construction of smallholder plantations at least 20% from the IUP-B or IUP area; and stated in Article 15 Paragraph (2) that the facilitation of development of community plantation are outside the IUP-B or IUP area. There is no obligation that 20% of the HGU area is for the community. Currently, the company has facilitate a lot of area that is provided by the community to be used as plasma (smallholder) plantations. The company has completed and complied to all processes and completion of requirements related the extension of HGU that will end on 31 December 2019. The Village Community Plantation (KMD) land, which build by the company, are mostly owned by the Village Government and some is directly owned by the individual.

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	<ul style="list-style-type: none"> • There is no replanting work in PT Agro Muko that uses contractor from Mukomuko Regency officials. • The company has carried out HCV management and monitoring. Monitoring of HCV are performed by assigned Ranger and making reports to the BKSDA (Conservation Office) if necessary action needed related protected wildlife. • The management of HCV is in accordance to the concept of conservation such as the construction of river border roads and planting oil palm in areas that have been designated as HCV such as on the coast border. • The company has RSPO standards that must be complied. The company will receive community FFB if the management of community plantation meets the RSPO certification standards. • Absorption of local labor in the company is above 40%. • Salary for casual workers in the company are in accordance with the provisions of the Bengkulu Province Minimum Sector Wage (UMSP).
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> • The process of HGU extension has been performed by the company and accepted by Land Office of Mukomuko Regency. Field verification has been done in 2017. Land Office of Mukomuko Regency has submit letter to the Land Office of Bengkulu Province No.405/100-17.16/IX/2019 dated 20 September 2019, regarding proposal for extension of HGU No.02/MU covers 2,269.3205 Ha located in District of V Koto, Teras Terunjam and Selagan Raya; and letter No.450/100-17.16/X/2019 dated 23 October 2019, regarding proposal for extension of HGU No.03 covers 7,730 Ha located in District of Air Dikit, Teras Terunjam, Penarik and Selagan Raya. It also available letter from Land Office of Bengkulu Province to Miniters of Agraria and Spatial (Chairman of National Land Office) No.1363/SP-300.HP.01/X/2019 dated 31 October 2019, comprise all required document for HGU extension. Regarding this HGU extension which is still in process, the Company has obtained recommendation letter from Regent of Mukomuko Regency to continue investment and operational activities, based on letter No.750/389/A.1/XII/2019 dated 14 December 2019. • Audit team has conducted verification to the HCV area stated by JPKP, founded that the HCV management riparian area and coast border area of Tanah Rekah Esatte are in accordance to the concepts of conservation.
<p>6</p>	<p>Feedbacks: Village of Bukit Harapan</p> <ul style="list-style-type: none"> • Bukit Harapan villagers thank to PT. Agro Muko against assistance on development of smallholders or KMD's. • Smallholders or KMD management using full managed scheme, where communities giving all agronomy activities to the company. • Relationship with the company are doing well, including if any proposing on road maintenance by villagers, there is no rejection from the company. <p>Management Responses:</p> <ul style="list-style-type: none"> • Thank you for the statement from Head of Village Bukit Harapan, that stated that it was greatly helped by the existence of a village community plantation (KMD) and the Company hopes that this can be a good communication and relationship between the Company and the communities around the Company. • Confirm that there were no land disputes between the company and the villagers of Bukit Harapan during 2019. • Thank you for declaring that there are no issues regarding environmental pollution caused by the company's operations. <p>Audit Team Findings: Audit team noted the statement from villages and response from PT Agro Muko.</p>
<p>7</p>	<p>Feedbacks: Village of Pasar Bantal, Sub-District of Teraman Jaya</p> <ul style="list-style-type: none"> • Smallholder land of KMD origin from community land that have been compensated collectively as ± 15 Ha. • Agreement of Smallholder (KMD) Development has been expired in 2016, currently in 2019 is

	<p>ongoing for renewal agreement and the revised document already proposed to PT. Agro Muko. However, its renewal agreement is not finished made by the company until November 2019.</p> <ul style="list-style-type: none"> • Since smallholders (KMD) has been developed, there is no follow up made by the company if any proposal submitted from the village. In example: proposal for rice field water drainage and local beach tourism in 2018, no follow up made by the company until now. • So far, there is no CSR given by the company to the Bantal village, just rely on KMD yield only. <p>Management Responses:</p> <ul style="list-style-type: none"> • Confirm that the company stating that the relationship with the company going well and the company has implemented a social program in accordance with the proposal sent by the village government. • Confirm that the public already knows the boundaries of the company's HGU in the form of a HGU stake that is installed along the HGU boundary. • The company will conduct an evaluation related to reports that villagers are prohibited from going through the company's road at night in the Mukumuko Estate area. • The company, through the smallholder manager, will disseminate the Management of KMD Setia Budi regarding the development of the KMD including its financial condition which is not yet known by the village government. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> • Audit team noted that the company will conduct an evaluation on relationship between Pasar Bantah Village and management. • Audit team noted that the smallholder manager will disseminate the development progress of KMD Pasar Bantal to the village government.
<p>8</p>	<p>Feedbacks:</p> <p>Gender Committee</p> <ul style="list-style-type: none"> • There is no complaints from member related to sexual harassment/violence during 2019 received by the Gender Committee. • The company regularly carries out pregnancy checks to female workers who work at high risk stations such as chemical sprayers and fertilizer applicators. • The company has provided breastfeeding time for female workers who are in the period of breastfeeding, which is at 10:00 to 11:00 and 15:00 to 15:30. • The company policies have been disseminated in relation to the prohibition of sexual harassment/violence and the protection of reproductive rights to employees. • There is no indication of discrimination in employment based on gender, religion, age, ethnicity, race, political affiliation, etc. • The company has realized the protection of women's reproductive rights such as providing complete PPE for sprayers and fertilizers, conducting health checks (General Check-up) every 6 months for spray and fertilizer workers, transferring female workers who work at high-risk stations (Spraying and Fertilizing) to other types of work that are not at high risk, if indicated pregnant after pregnancy test. • The company gives maternity leave rights for 90 days and period leave 2 days. • The mechanism for submitting complaints related to sexual harassment/violence are using SOP Grievance, and Wistleblower is protected by the Wistleblowing Policy. <p>Management Responses:</p> <ul style="list-style-type: none"> • Thank you for the confirmation from Mrs. Mariana regarding there were no complaints from members about sexual harassment/violence during 2019 and we will continue to maintain this. • Confirm that the Company regularly carries out pregnancy checks to female workers who work at high-risk stations such as chemical sprayers and fertilizers, so that the health of the Company's employees is well maintained. • Confirm that the company has provided breastfeeding time for female workers who are currently breastfeeding, which is at 10:00 to 11:00 and 15:00 to 15:30. • Confirm that dissemination of company policy has been carried out in relation to the prohibition of sexual harassment/violence and the protection of reproductive rights to employees during Morning

	<p>Briefing.</p> <ul style="list-style-type: none"> • Confirm that there are no indications of discrimination in employment based on Gender, Religion, Age, Ethnicity, Race, Political Affiliation, etc. and this is supported by Company Policy. • Confirm that the Company has realized the protection of women's reproductive rights such as providing PPE for sprayers and fertilizers, conducting health checks (General Check-up) every 6 months for spray and fertilizer workers, transferring female workers who work at high risk (Spraying and Fertilization) to other types of work that are not at high risk, if indicated pregnant after a pregnancy test. The Company grants 90 days maternity leave and 2 days of period leave. • The company has a complaint mechanism related to sexual harassment/violence using the SOP of Grievance and the Wistleblower is protected by the Wistleblowing Policy. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> • Audit team note positive comment from Gender Committee. • Audit team noted the PT Agro Muko performance and provision of normative rights for employees. • Audit team have noted PT Agro Muko statement related to protection reproductive rights.
<p>9</p>	<p>Feedbacks: Labor Union, SPAM</p> <ul style="list-style-type: none"> • There are no issues related to employment. • All levels of the workforce have been registered in BPJS-Kesehatan (medical insurance) and BPJS-Ketenagakerjaan (social insurance). • Meetings with management are held every 2 months, but it is possible to conduct meeting incidently if there are problems occur. • Collective Labor Agreement (PKB) is still valid until 2020. • There are no indications of discrimination, forced labor, use of child labor, intimidation of workers by the company. • The company has implemented policies as regulated in the Collective Labor Agreement, including the provision of PPE, employee housing and other facilities, wages in accordance with the agreement that was signed together. <p>Management Responses:</p> <ul style="list-style-type: none"> • Thank you for the statement of Mr. Abdul Said that there were no issues related to employment. • Confirm that that all Company employees have been registered in the BPJS-Kesehatan (medical insurance) and BPJS-Ketenagakerjaan (social insurance). • Confirm that the meeting with management program is conducted every 2 months, but it is possible to conduct meeting incidently if there are problems occur. • Confirm that the Collective Labor Agreement (PKB) is still valid until 2020 and has been ratified by the Manpower Office of Mukomuko Regency. • Confirm that there are no indications of discrimination, forced labor, use of child labor, intimidation of workers by the company in accordance with Company policies that have been applied. • Confirm that the Company has implemented policies as regulated in the Collective Labor Agreement, including the provision of PPE, employee housing and other facilities, wages in accordance with the agreement that signed together. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> • Audit team noted the PT Agro Muko performance and provision of normative rights for employees. • Audit team have noted PT Agro Muko's policy and implementation related to no discrimination.
<p>10</p>	<p>Feedbacks: PT SSI, outsourced Security (Bambang Irawan)</p> <ul style="list-style-type: none"> • At the beginning of work, they have received basic security training. • Works based on the Access Control SOP that has been referred by PT SSI. • Not equipped with firearms. • Dissemination has been carried out by PT Agromuko related to the Commitment to Enforcement of Human Rights. • Identification of security vulnerable points has been carried out • Wages are in accordance with the Mukomuko Regency Minimum Wage (UMR) and have been

	<p>registered in the BPJS-Kesehatan and BPJS-Ketenagakerjaan.</p> <ul style="list-style-type: none"> All work equipment is provided by PT SSI. Some of the workers come from the surrounding community, for example there are 3 people who come from Sari Bulan Village. Has understood the prohibition of intimidation to the surrounding community.
	<p>Management Responses:</p> <ul style="list-style-type: none"> Confirm that PT SSI has conducted basic security training for new security personnel recruited prior to start working at the Company. Confirm that PT SSI has been working based on the Access Control SOP that has been referred by PT SSI. In accordance with SOP, PT SSI is not equipped with firearms. Confirm that PT Agro Muko has conducted dissemination related to the Commitment of Enforcement of Human Rights. Confirm that the Company and PT SSI have identified security vulnerable points. PT SSI has been following Bengkulu Province minimum wage (UMP) and has been registered in the BPJS-Kesehatan and BPJS-Ketenagakerjaan. It is true that all work equipment provided by PT SSI. Recruitment of PT SSI security personnel prioritizes local residents who meet the requirements in accordance with PT SSI SOP. PT SSI security personnel have understood the prohibition of intimidation to the surrounding community.
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> Audit team noted that PT Agro Muko has contracted PT SSI for security services. Audit team noted that recruitment of PT SSI security personnel prioritizes local residents who meet the requirements in accordance with PT SSI SOP.

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
Mr. Bustami (Air Bikuk Village)	Hereditary	4 Ha	Yes	No	Comply
Mr. Abdul Latif (Air Bikuk Village)	Hereditary	3 Ha	Yes	No	Comply
Mr. Syahril (Air Bikuk Village)	Hereditary	2 Ha	Yes	No	Comply
Mr. Kadri (Bantal Village)	Hereditary	4 Ha	Yes	No	Comply
Mr. Syahril (Bantal Village)	Hereditary	7 Ha	Yes	No	Comply

Previous land owner / user comment	
#1	<p>Feedbacks: Previous Land Owner of Air Bikuk Village (Mr. Bustami, Mr. Abdul Latif and Mr. Syahril)</p> <ul style="list-style-type: none"> Previously, their land planted with rice, dogfruit, coffee, cinnamon and rubber plants with shifting cultivation mechanism. In 1991, the company start to conduct early socialisation and informed to communities for developing of oil palm plantation. The process of socialization and land mapping is carried out at the Village Hall by gathering all



	<p>villagers who own land within the company's HGU for an inventory. As many as ± 50 people were gathered for the process of land acquisition.</p> <ul style="list-style-type: none"> • The process of land compensation is not forced, but given the optional of acquisition. The compensation land belongs to Mr. Bustami area of ± 4 Ha, Bpk. A. Latif is ± 3 Ha, while Mr. Syahril ± 2 Ha, where the currently the land located in Air Bikuk Estate. • There have been no complaints or land disputes between the community and the company to date, because the company has contributed a lot to the village. <p>Management Responses:</p> <ul style="list-style-type: none"> • Thank you for the confirmation from Mr. Bustami, Mr. Abdul Latif and Mr. Syahril who stated that the company with integrated team conducting mediation and dissemination regarding program to develop an oil palm plantation. • Thank you for the confirmation from Mr. Bustami, Mr. Abdul Latif and Mr. Syahril who stated that the mediation, dissemination and land mapping process was carried out at the Village Hall by gathering all villagers who owned land in the company's HGU to carry out an inventory. • Thank you for the confirmation from Mr. Bustami, Mr. Abdul Latif and Mr. Syahril who stated that the compensation process was not forced, but had the right to choose for release. • Thank you for the confirmation from Mr. Bustami, Mr. Abdul Latif and Mr. Syahril who stated that there were no complaints or disputes between the community and the company to date, because the company has added contributions to the village. <p>Audit Team Findings:</p> <p>Audit team noted that land compensation has been made through the process of mediation, dissemination and mapping of cultivated land controlled by the community. Planting compensation are according to the Joint Agreement and the market price applicable. The process of mediation and dissemination and land mapping is carried out at the Village Hall by gathering all villagers who owned land above the company's HGU for an inventory. The process of compensation for land is not forced, but given the option of acquisition.</p>
<p>#2</p>	<p>Feedbacks:</p> <p>Previous Land Owner of Bantal Village (Mr. Kadri and Mr. Syahril)</p> <ul style="list-style-type: none"> • Previously, their land planted with rice, coffee, cinnamon and rubber plants with shifting cultivation mechanism. In 1996-1997, the company start to conduct early socialisation and informed to communities for developing of oil palm plantation. • Due to the poor economic condition of the community at that time, the community welcomed that if plantations were developed, the community could work in the company and be able to improve their economy. Thus, the community receives their land for compensation. • The process of compensation for land is not forced, but given the option of acquisition. During the land acquisition, there was an integrated team consisting of representatives from sub-districts, villages, districts, companies and traditional leaders. The compensation land belongs to Mr. Kadri area of ± 4 Ha, while the land of Bpk. Syahril ± 7 Ha, where the land is currently in Division 2 Bunga Tanjung Estate. • Local wisdom and local culture of the Bantal villagers at that time were still very strong, so the land compensation process followed the advice of the local customary leader. <p>Management Responses:</p> <ul style="list-style-type: none"> • Thank you for the confirmation from Mr. Kadri and Mr. Syahril who stated that the company conducted a mediation and disseminate program to develop an oil palm plantation. • Thank you for the confirmation from Mr. Kadri and Mr. Syahril who stated that the community agreed their land for compensation. • Thank you for the confirmation from Mr Kadri and Mr Syahril stating that the land compensation process was not forced, but was given the free option. • Thank you for the confirmation from Mr. Kadri and Mr. Syahril who stated that the local wisdom and local culture of the people of Bantal Village were still very strong, so the land compensation process followed the advice of the local customary leader. <p>Audit Team Findings:</p>

Audit team noted that land compensation has been made through the process of mediation, dissemination and mapping of cultivated land controlled by the community. Planting compensation are according to the Joint Agreement and the market price applicable. The process of mediation and dissemination and land mapping is carried out at the Village Hall by gathering all villagers who owned land above the company's HGU for an inventory. The process of compensation for land is not forced, but given the option of acquisition.

3.6 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT Agro Muko – Bunga Tanjung POM has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of PT Agro Muko – Bunga Tanjung POM is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Imam Fakhrurozi	Name: Sander Van den Ende
Company Name: on behalf of BSI Services Malaysia Sdn Bhd	Company Name: PT Agro Muko – Bunga Tanjung POM
Title: Lead Assessor	Title: Regional Director Sustainability
Signature: 	
Date: 13 January 2020	Date: 14 January 2020

Criterion / Indicator	Assessment Findings	Compliance
<p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>		
<p>Criteria 1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>		
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p> <p>Based on the verification of documents, it shows that every Estate that becomes the supply base of Bunga Tanjung POM has issued a document list of Publicly Available Document, updated on 1 February 2019, for example:</p> <ul style="list-style-type: none"> • Plantation Business Permit, • Internal Social Impact Report, • HCV Assessment, • Environment Management and Monitoring Reports (RKI-RPL) every semester, • Continuous Improvement Plan, • Records of internal and external complaints, • Permanent Business Permit, • Plantation Business Permit, • Social Impact Report Internal, • Permit for Discharge of Wastewater into the River, • Public Summary of RSPO Certification Assessment Report, <p>These documents has included the Officers responsible for responding to requests for information, it is the Estate Manager and Office Assistant.</p>	<p>Comply</p>
<p>1.1.2</p>	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>All Estate and Mill: Based on document verification, it shows that:</p> <ul style="list-style-type: none"> • There are types of information provision documents available in Bahasa Indonesia, such as the RKL-RPL Implementation Report, CD / CSR Program Report, HGU Permit, Plantation Business License. • Types of documents available in English, such as the RSPO Public Summary Report from PT BSI. • Documents made using 2 languages, Indonesian and English, such as Company policy documents. 	<p>Comply</p>
<p>1.1.3</p>	<p>(C) Records of requests for information and responses are</p> <p>Records of information requests are documented in the "Information and Response Request Book" available at each Estate or Mill, for example:</p>	<p>Comply</p>

	<p>maintained.</p>	<p>Bunga Tanjung POM: Based on document verification, it shows that Records of information requests in Bunga Tanjung POM are documented in the " Buku Permintaan Informasi dan Jawaban Eksternal", which during 2019, there were 9 types of information requests, such as:</p> <ul style="list-style-type: none"> • Application for Industrial Work Practice permit, submitted by Mukomuko 01 Vocational High School on 4 October 2019 through letter No. 420/168/D.6/ SMKN01/MM/2019; have been responded to by the company through Letter No. 87/RMO-PH3/X/19 dated 9 October 2019. • Application for Research Permit, submitted by Bengkulu University on 29 August 2019 through Letter No.2047/UN30.11/PI/2019 and has been responded to by the company through Letter No.74/RMO-PH3/IX/2019 dated 10 September, 2019. • Application for a permit for technical internship, submitted by the University of Bengkulu on 28 March 2019 through Letter No. 507/UN30.11/PI/2019 and has been responded to by the company through Letter No.27/RMO-PH3/IV/2019 dated 6 April 2019. <p>The Company has consistently sent the obligation to provide information to relevant agencies as regulated in other laws or government regulations. There are routine reports carried out by each Estate such as Hazardous Waste Management Reports that are reported every 3 months, Safety Committee Reports that are reported every 3 months, Waste Water Management Reports which are reported by Mukomuko POM every 3 months, Report of Infrastructure Preparedness for Land Fire Control, every 6 months. However there are also routine reports that are submitted based on company intentions, for example RKL-RPL Implementation Reports and UKL-UPL Implementation Reports which are reported every 6 months, Report of Manpower that reported annually.</p> <p>Types of routine reports submitted to related agencies for example:</p> <ul style="list-style-type: none"> • Report on PT Agro Muko's RKL-RPL (Environment Management Plan) Implementation, which was reported on 20 August 2019, as evidence in handover letter No.20/ RMO-BKL/ENC/M/VIII/2019 sent to the Bengkulu Provincial Environment Agency. • Report on the Implementation of PT Agro Muko Biogas Plant UKL-UPL for the first semester of 2019, which was reported on 1 October 2019, as evidence in document submission No. 87/MMPOM/IX/2019 to the Environmental Service Office of Mukomuko Regency. • Report on the management of hazardous waste in Mukomuko POM period April to June 2019, which was 	
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		<p>sent to the Ministry of Environment and Forestry on 23 July 2019 as evidence in the electronics acceptance.</p> <ul style="list-style-type: none"> • P2K3 (Safety Committee) report for period July - September 2019 of Mukomuko Estate sent to Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kabupaten Moukomuko through letter dated 25 October 2019. • PT Agromuko and PT Mukomuko Agro Sejahtera’s Report of infrastructure preparadeness for land fire control sent to Agriculture Office of Mukomuko Regency through Letter No.26/RMO/ENC/M/XI/2019 dated 6 November 2019. 	
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>All Estate & POM: The company has established and maintained Procedure for Responding to Request for Information (Doc No. ENC-01-11/04-03-2019/Rev.1) dated 18 Mar 2019. The procedure described that:</p> <ul style="list-style-type: none"> • The company provide types of document that can be accessed by public. • The company have a list of stakeholder directly impacted by estate or mill activity. • PIC to give respond on information request are unit manager in coordination with Senior Manager Administartion (SMA). • Respond time for information request are 3 days for management unit to communicate to RMO (Regional Management Office), if RMO does not have authority to give respond, then RMO forwarded to Head Office maximum 7 days from receiving request from operation unit. Maximum respond time are 25 days. <p>Based on verification, it shows that all information request received by the company, has been responded in timely manner (see indicator 1.1.3).</p>	Comply
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p>	<p>All Estate & POM: Each estate and Mukomuko POM consistently has developed and updated list of stakeholder annually. The list of stakeholder have been categorized as follows:</p> <ul style="list-style-type: none"> • Stakeholder that consist of Village apparatus, District, Regency, e.g. Environment Agency, Manpower Agency, Village Head, District Head. • Stakeholder that consist of public figure (Kepala Adat/Kepala Kaum). • KUD/KMD which have agreement with the company. • Local NGO around the company. • Stakeholder that consist of worker union, employee cooperation. • Stakeholder that consist of contractors which have agreement with the company. • Stakeholder that consist of estates from other company. 	Comply

		The list of stakeholder has been verified with name of PIC, address and contact number.	
Criteria 1.2			
The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	In general, companies under SIPEF Group have had policy related to Ethical Conduct which have been signed by President Director.	Comply
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	It was available letter issued by Regional Director of Bengkulu No.38/RMO-AM-All.Ou/IX-19 dated 4 September 2019, stated that base on direction from President Director, implementation of Good Coporate Governance is to handle complaint professionally both from internal or external. Base on this, management stated that complaints can be submitted through phone number 0811 636 2200. Mechanism of Ethical Business violation handling is using SOP Wistleblowing System (SOP No. IAD-01-07/29-03-2019/Rev. 0) dated 27 March 2019. Based on document verification of complaints and management information, it stated that during 2019, there is no case of Ethical Business violation.	Comply
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 with applicable legal requirements.	Supply bases Bunga Tanjung POM consist of Own Estates, Smallholders (KMD's) and Smallholders Cooperative. During Surveillance-1.4 in 2019, sample of KMD's located Air Buluh Estate (ABE) are KMD Tanjung Harapan, KMD Bukit Harapan, KMD Mundam Marap. <u>HGU Holder:</u> Air Buluh Estate: Certificate No. 21, based on SK BPN No. 7/HGU/990, dated 3 May 1990. Validity period: 31 December 2020. Hectarage: 2,500 Ha. Air Bikuk Estate: Certificate No. 45, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 1,410 Ha. Bunga Tanjung Estate: Certificate No. 47, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 2,903 Ha.	Comply

Sample KMD's surrounding Air Buluh Estate has complied with legal requirements, as follow:

Air Buluh Estate KMD's

No	KMD's	Size (Ha)	Land ownership reference
1	Tanjung Harapan	9.00	SKT No. 06/SKT/XI/2007; SKT No. 07/SKT/XI/2007; SKT No. 08/SKT/XI/2007; SKT No. 09/SKT/XI/2007; SKT No. 10/SKT/XI/2007
2	Bukit Harapan	9.65	SKT No. 06/DS-BH/SKT2012; SKT No. 07/DS-BH/SKT2012; SKT No. 08/DS-BH/SKT2012; SKT No. 09/DS-BH/SKT2012; SKT No. 10/DS-BH/SKT2012.
3	Mundam Marap	12.34	SKT No:27/SKT/DS-MM/IX/2017; SKT No:28/SKT/DS-MM/IX/2017; SKT No:29/SKT/DS-MM/IX/2017; SKT No:30/SKT/DS-MM/IX/2017; SKT No:31/SKT/DS-MM/IX/2017; SKT No:32/SKT/DS-MM/IX/2017; SKT No:33/SKT/DS-MM/IX/2017.

MoU between KMD's and the company as legal reference:

KMD Desa Tanjung Harapan

"Naskah Perjanjian Kerjasama Pelaksanaan Pembangunan, Pengelolaan dan Pemanfaatan Kebun Masyarakat Desa Tanjung Harapan", dated 17 November 2009. Validity of MoU is until replanting.

KMD Desa Bukit Harapan

"Perjanjian Kerja Sama tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit Antara Desa Bukit Harapan dan PT. Agro Muko", dated 21 June 2014. Validity period until 30 June 2039.

KMD Desa Mundam Marap

"Perjanjian Kerja Sama tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit Antara Desa Mundam Marap dan PT. Agro Muko", dated 26 October 2017. Validity period until 31 October 2042.

Koperasi Perkebunan Sejahtera Bersama (KPSB):

- Deed of Establishment of Akta Pendirian Koperasi Perkebunan Sejahtera Bersama (KPSB) No: 02, dated 1 December 2010 oleh Notaris Nurhasni Arif, SH.
- Total managed area of KPSB-MMAS is 173.75 Ha with total 132 land owner. Land status is "Surat Keterangan Tanah".

Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA):

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- Deed of Establishment "Akta Pendirian Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)" No: 17, dated 15 September 2009 by Notary Emelia Ratna Sari Dewi, SH.
- Total managed area of KOPABA is 10.40 Ha with total 127 land owner. Land status is "Surat Keterangan Tanah".

Bunga Tanjung Estate:

No	KMD's	Size (Ha)	Land ownership reference
1	Pasar Bantal	15.00	Surat Penyediaan Tanah Kas Desa Pasar Bantal No: 002/KPD/IV/2001
2	Nelan Indah	11.25	SKT No. 592.11/84/SKT-BT/17.06.12.20; SKT No. 592.11/85/SKT-BT/17.06.12.20; SKT No. 592.11/86/SKT-BT/17.06.12.20; SKT No. 592.11/87/SKT-BT/17.06.12.20; SKT No. 592.11/88/SKT-BT/17.06.12.20; SKT No. 592.11/89/SKT-BT/17.06.12.20.

KMD Bantal – Bunga Tanjung Estate:

- Perjanjian Kerjasama Panitia Desa Pasar Bantal dengan PT. Agro Muko tertanggal 7 April 2001. Masa berlaku perjanjian hingga 15 tahun (6 April 2016).
- Renewal Draft of Partnership Agreement "Naskah Perjanjian Kerjasama antara Pemerintah Desa Pasar Bantal No: 143/___/Kec.08-01/X/2019 dengan PT. Agro Muko Nomor: ___/___/___/2019 tentang Pelaksanaan Pengelolaan dan Pemanfaatan Hasil Kebun Masyarakat Desa (KMD) Pasar Bantal". However, this agreement submitted to the company Regional Management Office according to letter No. 20/BTE-RMO/X-19, dated 15 October 2019 (no respond yet).

KMD Nelan Indah – Bunga Tanjung Estate:

- Agreement of "Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit Antara Desa Nelan Indah dan PT. Agro Muko, dated 7 October 2014. Validity period 1 October 2014 – 31 October 2039.
Due to KMD's land is from individual ownership, there is separated agreement between Desa Nelan Indah to Land Ownership related profit sharing. This agreement is based on Notary Deed "Akta Notaris No: 028/2015 tentang Perjanjian Kerjasama Antara Bapak Sapri dengan Panitia Kebun Masyarakat Desa Nelan Indah tentang Pembukaan Kebun Masyarakat Desa". Notary Eyota Madius, SH dated 27 January 2015.

No	KMD's	Size (Ha)	Land ownership reference
1	Air Bikuk	15.00	SKT No. 065/KPD/IV/2001, dated 15 April 2019;
2	Pondok Suguh	13.11	SHM No. 07.08.10.08.1.05393 (2.16 Ha); SHM No. 07.08.10.08.1.05394 (2.63 Ha); SHM No. 07.08.10.08.1.05395 (2.64 Ha); SHM No. 07.08.10.08.1.05396 (2.62 Ha); SHM No. 07.08.10.08.1.05397 (2.16 Ha). Total: 13.11 Ha. Issued 2017.

KMD Air Bikuk – Air Bikuk Estate: 13 Ha

Agreement "Perjanjian Kerja Sama Kebun Masyarakat Desa Air Bikuk dengan PT. Agro Muko (Adendum No.1) antara Desa Kuala Teramang, KMD Air Bikuk dan PT. Agro Muko, tertanggal 15 Februari 2014". Validity period 1 January 2013 – 1 January 2023.

Progress of land ownership certificate submission for smallholders land (KMD's) is according to decree of Kementerian Agraria dan Tata Ruang Nomor: 455/100-17.16/X/2019, dated 29 October 2019. This letter concern to submission of smallholders certificate upon renewal Land Title or "HGU" Nomor 00014 (previous HGU Number 00002).

Scope of submission land owner certificate for smallholders are KMD Air Buluh (14.77 Ha); KMD Nelan Indah (10.04 Ha); KMD Bukit Harapan (9.49 Ha); KMD Air Berau (10.19 Ha); KMD Tanjung Harapan (8.68 Ha); KMD Mundam Marap (1.04 Ha).

Data verified:

- Storage tank certificate "UPT Metrologi Legal Pemerintah Kota Padang - Sertifikat Tabel Volume Tangki No.510.3/UPT-ML/SKHP/XII/2016 tangki No.1, volume 2,983,061 liters", date of verification December 2016. Permit dated 27 December 2016 – 30 November 2022.
- Storage tank certificate "UPT Metrologi Legal Pemerintah Kota Padang - Sertifikat Tabel Volume Tangki No.21/MTM/SKHK/II/2019 tangki No.7, volume 2,548,575 liters", date of verification February 2019. Permit dated 26 February 2019 – May 2025.
- Business operating license "Tanda Daftar Perusahaan PT. Agro Muko No.02.12.1.46.04882/5059/5257/11/2014" dated 6 November 2014.
- Business Registration Number "Nomor Induk Berusaha (NIB) 8120315021077 untuk PT. Agro Muko", dated 17 October 2018 (pengesahan TDP).
- Health and Safety certificate "Sertifikat Ahli K3 Umum No.10/4631/AK3-U/DJPPK-P2K/VI/2020 atas nama

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		<p>Thres Martin”, dated 10 June 2010.</p> <ul style="list-style-type: none"> • Appointment of OHS Officer “Keputusan Menteri Ketenagakerjaan Ri No.KEP.P.0165/NAKER-BINWASK3/IX/2017 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Thres Martin”, dated 20 September 2017 – valid 3 years. • License for OHS Officer “Lisensi Ahli K3 Umum No.Reg.4980/PK3/AJ/17/2017/P2 atas nama Thres Martin”, dated 20 September 2017 – 20 September 2020. • Permit for power generator “Izin Pengesahan Pemakaian Diesel Pembangkit Tenaga Listrik No.017/SOSNAKER/MD/VI/2010 fpr PT. Agro Muko Tank Terminal Teluk Bayur, brand Caterpillar, 377 KVa”, dated 16 July 2010. Latest inspection on October 2018, based on “Laporan Hasil Pemeriksaan dan Pengujian Berkala Motor Diesel Pembangkit Tenaga Listrik No.563/742/UPTD-Wil.I/2018 for brand Caterpillar, 377 KVa, dated 14 November 2018. Valid for 2 years. • Permit for lighting arrester “Pengesahan Penggunaan Instalasi Penyalur Petir di Tempat Kerja No.010/Sosnaker/Petir/IV/2013 untuk PT. Agro Muko Tank Terminal”, dated 8 May 2013. Latest inspection on June 2019, based on “Laporan Hasil Pemeriksaan dan Pengujian Berkala Instalasi Penyalur Petir No.563/131/UPTD-Wil.I/2019 for brand Electrostatic/Viking, dated 21 June 2019. Valid for 2 years. • Permit for hazardous waste storage “Keputusan Kepala Dinas Lingkungan Hidup Kota Padang No.47 tahun 2017 tentang Pemberian Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun pada Kegiatan Tangki Peyimpan Minyak Kelapa Sawit PT. Agro Muko”, dated 29 March 2017 – valid for 5 years. Scope of storage waste: “oli bekas, fuel filter bekas, filter bekas aki bekas, kain majun terkontaminasi, lampu TL, cartridge bekas, baterai kering, wadah bekas bahan kimia, peralatan laboratorium, bahan kimia kadaluarsa, limbah B3 dari kegiatan sendiri” 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p>	<p>Certificate holder has documented system for ensuring legal compliance and monitoring on track changes to the law. The system is available within the procedure “<i>Prosedur Informasi Perubahan Undang-Undang dan Peraturan Pemerintah</i>”, Doc. No: CA/SOP/01, issued 1 November 2011.</p> <p>Monitoring for updating the changes of law and regulation conducted in monthly basis by Environment and Conservation Department. Based on list of updated law, ministry decree and other regulation were applicable for unit of certification are 11 regulation changes in 2018 and 4 regulation changes in 2019 (upto October 2019).</p> <p>In example:</p> <ul style="list-style-type: none"> • Land Decree (Peraturan Menteri Agraria dan Tata Ruang – Badan Pertanahan Nasional) Nomor: 14 Tahun 2018, related Location Permit. • Forestry and Environmental Decree (Peraturan Menteri LHK) No: 20 Tahun 2018, related List of Protected 	Comply

		<p>Flora and Fauna. This updating list of regulation changes is applicable for own Estates, KMD's and Smallholders Cooperative. Supply base Bunga Tanjung POM: PT. Agro Muko: Air Buluh Estate, Air Bikuk Estate, Bunga Tanjung Estate PT. MMAS: Malin Deman Estate</p> <p><u>HGU Holder:</u> Air Buluh Estate: Certificate No. 21, based on SK BPN No. 7/HGU/990, dated 3 May 1990. Validity period: 31 December 2020. Hectarage: 2,500 Ha. Air Bikuk Estate: Certificate No. 45, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 1,410 Ha. Bunga Tanjung Estate: Certificate No. 47, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 2,903 Ha.</p>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p>	<p>Certificate Holder maintaining the legal boundaries based on legal documentation. All the boundary pegs are mapped out in appropriate scale.</p> <p>Air Buluh Estate (ABE): "Peta Patok HGU Air Buluh Estate" Scale 1:44,458. During field observation at boundary pegs No. 053 (Block 00W02a, Div. 5); No. 081 (Block 02X03A, Div. 5); No. 515 (Block 98P01A, Div. 4).</p> <p>Malin Deman Estate (MDE): "Peta Point Patok BPN Malin Deman Estate" Scale 1:15,000.</p> <p>KMD Bukit Harapan: "Peta General Map" Scale 1:71,436. During field observation at KMD's area, legal boundary developed in form of "parit boundary".</p> <p>KMD Tanjung Harapan: "Peta General Map" Scale 1:80,000.</p>	Comply

		<p>KMD Mundam Marap: "Peta General Map" Scale 1:50,000.</p> <p>Bunga Tanjung Estate: HGU21 adjacent to block 98H01 coordinate 2°41'35.82"S and 101°22'41.26"E, in good condition, identification clear. Across the community plantation. HGU21A adjacent to block 98H01 coordinate 2°41'43.31"S and 101°22'27.56"E, in good condition, identification clear. Company create the moat as boundary with the community plantation. BPN22/TAP130 adjacent to block 98G03A coordinate 2°42'2.23"S and 101°22'26.96"E, in good condition, identification clear. Company create the moat as boundary with the community plantation. BTE22/TAP129 adjacent to block 98G02 coordinate 2°42'17.48"S and 101°22'20.64"E, in good condition, identification clear. Company create the moat as boundary with the community plantation.</p>	
<p>Criteria 2.2 All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	A list of contracted parties is maintained.	<p>PT Agromuko has prepared list of contracted parties "Daftar Kontrak", dated 16 September 2019. The list indicating contracted party name, contract number, scope of contracted work, date of contract, and remarks. The list comprise of 10 parties for manpower supply, replanting, palm sanitation, electric installation, health development.</p> <p>Air Buluh Estate (ABE): List of contractors 2019. Until October 2019, there is 13 contracts available. Sample of contracts seen as follow:</p> <ul style="list-style-type: none"> • Surat Perjanjian Kerja No. 156/ABE/RMO-AM/2019, dated 7 May 2019. This contract between PT. Agro Muko and PT. Delza Panca Agrapana for Electrical Installation at Worker Housing Air Buluh Estate. Clause/Pasal 9 requires disallowing child (min. age at 18 y.o); working tools shall comply with applicable safety laws; minimum wage shall follow with applicable minimum wage; must be ensuring social and accident insurance following BPJS. <u>Specific clause regarding forced and trafficked labour was not available.</u> • Surat Perjanjian Kerja No. 026/ABE/GMO-Eng/2019, dated 7 January 2019. This contract between PT. Agro Muko and CV. Bandar Ratu Agung, assignment job Concrete Road. Clause/Pasal 8 requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. <u>Specific clause regarding</u> 	Comply

		<p><u>forced and trafficked labour was not available.</u></p> <ul style="list-style-type: none"> • Surat Perjanjian Kerja No. 205/ABE/RMO-AM/2019, dated 30 August 2019. This contract between PT. Agro Muko and CV. Lisana Rollis Jabenk, assignment job: Repairing Housing, Warehouse, Mosque and Kindergarten at Air Buluh Estate. Clause 4: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. <u>Specific clause regarding forced and trafficked labour was not available.</u> <p>Malin Deman Estate (MDE): List of contractors 2019. Until October 2019, there is 5 contractors and 7 contracts available. Sample of contracts seen as follow:</p> <ul style="list-style-type: none"> • Perjanjian Pemborongan Pekerjaan No: 01/KSU-MMAS/PPTK-FL/I/2019, dated 1 January 2019. This contract between PT. Muko Muko Agro Sejahtera and Koperasi Serba Usaha Agro Muko (KSU-AM), assignment job Upkeep and Maintenance. This contract contain disallowing child labour (Clause/Pasal 8), follow applicable law and regulation (Clause/Pasal 3). The listed workers has been registered by Manpower Agency refer to No: 560/20/D.3/IV/2019, dated 21 May 2019. Contract reference "Perjanjian Kerja Harian Lepas Nomor: 01/KSUAM/BHL/I/2019, dated 1 May 2019". • Surat Perjanjian Kerja No. 003/MMAS-PLAM/TRANS.FFB-BOX/I/2019, dated 31 December 2018. This contract between PT. MMAS and CV. IPUH JOIN PRATAMA for assigning job FFB transport from Block to Market/FFB plate at Plasma Air Merah (KPSB-MMAS). Clause 3: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. <u>Specific clause regarding forced and trafficked labour was not available.</u> • Surat Perjanjian Kerja No. 004/MMAS-PLAM/TRANS.FFB-MILL/I/2019, dated 31 December 2018. This contract between PT. MMAS and CV. IPUH JOIN PRATAMA for assigning job FFB transport from Market/FFB plate to Bunga Tanjung POM at Plasma Air Merah (KPSB-MMAS). Clause 3: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. <u>Specific clause regarding forced and trafficked labour was not available.</u> <p>Bunga Tanjung Estate: There is 13 contracts available in BTE since Jan 2019. All contractors is well maintained.</p>	
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2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p>	<p>Air Buluh Estate (ABE): List of contractors 2019. Until October 2019, there is 13 contracts available. Sample of contracts seen as follow:</p> <ul style="list-style-type: none"> • Surat Perjanjian Kerja No. 156/ABE/RMO-AM/2019, dated 7 May 2019. This contract between PT. Agro Muko and PT. Delza Panca Agrapana for Electrical Installation at Worker Housing Air Buluh Estate. Clause/Pasal 9 requires disallowing child (min. age at 18 y.o); working tools shall comply with applicable safety laws; minimum wage shall follow with applicable minimum wage; must be ensuring social and accident insurance following BPJS. <u>Specific clause regarding forced and trafficked labour was not available.</u> 	<p>Not Comply (Minor NC 1853924-201911-N1)</p>

- Surat Perjanjian Kerja No. 026/ABE/GMO-Eng/2019, dated 7 January 2019. This contract between PT. Agro Muko and CV. Bandar Ratu Agung, assignment job Concrete Road. Clause/Pasal 8 requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. Specific clause regarding forced and trafficked labour was not available.
- Surat Perjanjian Kerja No. 205/ABE/RMO-AM/2019, dated 30 August 2019. This contract between PT. Agro Muko and CV. Lisana Rollis Jabenk, assignment job: Repairing Housing, Warehouse, Mosque and Kindergarten at Air Buluh Estate. Clause 4: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. Specific clause regarding forced and trafficked labour was not available.

Malin Deman Estate (MDE):

List of contractors 2019. Until October 2019, there is 5 contractors and 7 contracts available. Sample of contracts seen as follow:

- Perjanjian Pemborongan Pekerjaan No: 01/KSU-MMAS/PPTK-FL/I/2019, dated 1 January 2019. This contract between PT. Muko Muko Agro Sejahtera and Koperasi Serba Usaha Agro Muko (KSU-AM), assignment job Upkeep and Maintenance. This contract contain disallowing child labour (Clause/Pasal 8), follow applicable law and regulation (Clause/Pasal 3). The listed workers has been registered by Manpower Agency refer to No: 560/20/D.3/IV/2019, dated 21 May 2019. Contract reference "Perjanjian Kerja Harian Lepas Nomor: 01/KSUAM/BHL/I/2019, dated 1 May 2019".
- Surat Perjanjian Kerja No. 003/MMAS-PLAM/TRANS.FFB-BOX/I/2019, dated 31 December 2018. This contract between PT. MMAS and CV. IPUH JOIN PRATAMA for assigning job FFB transport from Block to Market/FFB plate at Plasma Air Merah (KPSB-MMAS). Clause 3: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. Specific clause regarding forced and trafficked labour was not available.
- Surat Perjanjian Kerja No. 004/MMAS-PLAM/TRANS.FFB-MILL/I/2019, dated 31 December 2018. This contract between PT. MMAS and CV. IPUH JOIN PRATAMA for assigning job FFB transport from Market/FFB plate to Bunga Tanjung POM at Plasma Air Merah (KPSB-MMAS). Clause 3: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental

		<p>pollution. <u>Specific clause regarding forced and trafficked labour was not available.</u></p> <p>KMD Nelan Indah – Bunga Tanjung Estate: According to “Perjanjian Pemborongan Pekerjaan No: 01/TRPT-NI/KMD/IX/2019, dated 1 September 2019”. Contractor for KMD’s only for FFB transportation from KMD block to Bunga Tanjung POM. This contract between Village Nelan Indah and BUMDES Nelan Sejahtera. Within this contract was not contain clause <u>on meeting applicable legal requirements.</u></p> <p>KMD Bantal – Bunga Tanjung Estate: According to “Perjanjian Pemborongan Pekerjaan No: 02/TRPT-PB/KMD/IX/2019, dated 1 September 2019”. Contractor for KMD’s only for FFB transportation from KMD block to Bunga Tanjung POM. This contract between Village Pondok Baru (including Pasar Bantal) and CV. Dimas Putra. Within this contract was not contain clause <u>on meeting applicable legal requirements.</u></p> <p><i>Minor Non Conformity:</i> The contracts between PT. Agro Muko and the KMD (scheme smallholder), and CPO transporters have not contain specific clauses on meeting applicable legal requirements.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p>	<p>Socialization related this new indicator has been commenced by Team Leader ENC Department through email on 23 July 2019. However, since then the new contracts of third parties have not contain clauses disallowing child, forced and trafficked labour. Sample of contracts as follow:</p> <p>Air Buluh Estate (ABE): List of contractors 2019. Until October 2019, there is 13 contracts available. Sample of contracts seen as follow:</p> <ul style="list-style-type: none"> • Surat Perjanjian Kerja No. 156/ABE/RMO-AM/2019, dated 7 May 2019. This contract between PT. Agro Muko and PT. Delza Panca Agrapana for Electrical Installation at Worker Housing Air Buluh Estate. Clause/Pasal 9 requires disallowing child (min. age at 18 y.o); working tools shall comply with applicable safety laws; minimum wage shall follow with applicable minimum wage; must be ensuring social and accident insurance following BPJS. <u>Specific clause regarding forced and trafficked labour was not available.</u> • Surat Perjanjian Kerja No. 026/ABE/GMO-Eng/2019, dated 7 January 2019. This contract between PT. Agro Muko and CV. Bandar Ratu Agung, assignment job Concrete Road. Clause/Pasal 8 requires shall 	<p>Not Comply (Minor NC 1853924-201911-N2)</p>

		<p>comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. <u>Specific clause regarding forced and trafficked labour was not available.</u></p> <ul style="list-style-type: none"> • Surat Perjanjian Kerja No. 205/ABE/RMO-AM/2019, dated 30 August 2019. This contract between PT. Agro Muko and CV. Lisana Rollis Jabenk, assignment job: Repairing Housing, Warehouse, Mosque and Kindergarten at Air Buluh Estate. Clause 4: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. <u>Specific clause regarding forced and trafficked labour was not available.</u> <p>Malin Deman Estate (MDE): List of contractors 2019. Until October 2019, there is 5 contractors and 7 contracts available. Sample of contracts seen as follow:</p> <ul style="list-style-type: none"> • Perjanjian Pemborongan Pekerjaan No: 01/KSU-MMAS/PPTK-FL/I/2019, dated 1 January 2019. This contract between PT. Muko Muko Agro Sejahtera and Koperasi Serba Usaha Agro Muko (KSU-AM), assignment job Upkeep and Maintenance. This contract contain disallowing child labour (Clause/Pasal 8), follow applicable law and regulation (Clause/Pasal 3). The listed workers has been registered by Manpower Agency refer to No: 560/20/D.3/IV/2019, dated 21 May 2019. Contract reference "Perjanjian Kerja Harian Lepas Nomor: 01/KSUAM/BHL/I/2019, dated 1 May 2019". • Surat Perjanjian Kerja No. 003/MMAS-PLAM/TRANS.FFB-BOX/I/2019, dated 31 December 2018. This contract between PT. MMAS and CV. IPUH JOIN PRATAMA for assigning job FFB transport from Block to Market/FFB plate at Plasma Air Merah (KPSB-MMAS). Clause 3: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. <u>Specific clause regarding forced and trafficked labour was not available.</u> • Surat Perjanjian Kerja No. 004/MMAS-PLAM/TRANS.FFB-MILL/I/2019, dated 31 December 2018. This contract between PT. MMAS and CV. IPUH JOIN PRATAMA for assigning job FFB transport from Market/FFB plate to Bunga Tanjung POM at Plasma Air Merah (KPSB-MMAS). Clause 3: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. <u>Specific clause regarding forced and trafficked labour was not available.</u> 	
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		<p>KMD Nelan Indah – Bunga Tanjung Estate: According to “Perjanjian Pemborongan Pekerjaan No: 01/TRPT-NI/KMD/IX/2019, dated 1 September 2019”. Contractor for KMD’s only for FFB transportation from KMD block to Bunga Tanjung POM. This contract between Village Nelan Indah and BUMDES Nelan Sejahtera. Within this contract was not contain clause <u>disallowing child, forced and trafficked labour.</u></p> <p>KMD Bantal – Bunga Tanjung Estate: According to “Perjanjian Pemborongan Pekerjaan No: 02/TRPT-PB/KMD/IX/2019, dated 1 September 2019”. Contractor for KMD’s only for FFB transportation from KMD block to Bunga Tanjung POM. This contract between Village Pondok Baru (including Pasar Bantal) and CV. Dimas Putra. Within this contract was not contain clause <u>on meeting applicable legal requirements.</u></p> <p>Bunga Tanjung Estate: There is 13 contracts available in BTE since Jan 2019.</p> <p><i>Minor Non Conformity:</i> The contracts between PT. Agro Muko and KMD (scheme smallholder as FFB supplier), and CPO transporters have not contain clauses disallowing child, forced and trafficked labour.</p>																															
<p>Criteria 2.3 All FFB supplies from outside the unit of certification are from legal sources.</p>																																	
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Proof of the ownership status or the right/claim to the land by the grower/smallholder Where applicable, valid planting/operating/trading license, or is part of a cooperative which allows the buying and selling of FFB 	<p>Bunga Tanjung POM implementing IP model so that all FFB suppliers coming into the Mill are from certified area. Bunga Tanjung POM has had list of FFB origins, including:</p> <p>A. Information on geo-location of FFB origins.</p> <ul style="list-style-type: none"> Map of FFB suppliers from KMD smallholders (scale 1:45,000) FFB origins of Bunga Tanjung POM as listed in the Annex of Certificate. <table border="1" data-bbox="678 1173 1962 1374"> <thead> <tr> <th>No</th> <th>FFB Origin</th> <th>Scope</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bunga Tanjung Estate</td> <td>BTE</td> <td>2° 43’ 0.39” S</td> <td>101° 22’ 16.94” E</td> </tr> <tr> <td>2</td> <td>Air Bikuk Estate</td> <td>ABKE</td> <td>2° 46’ 27.67” S</td> <td>101° 24’ 44.68” E</td> </tr> <tr> <td>3</td> <td>Air Buluh Estate</td> <td>ABE</td> <td>3° 01’ 27.29” S</td> <td>101° 33’ 15.79” E</td> </tr> <tr> <td>4</td> <td>Malin Deman Estate</td> <td>MDE</td> <td>3° 01’ 27.29” S</td> <td>101° 33’ 15.79” E</td> </tr> <tr> <td>5</td> <td>Koperasi Perkebunan Desa Air Buluh</td> <td>KOPABA</td> <td>3° 3’ 15.11” S</td> <td>101° 29’ 53.43” E</td> </tr> </tbody> </table>	No	FFB Origin	Scope	Latitude	Longitude	1	Bunga Tanjung Estate	BTE	2° 43’ 0.39” S	101° 22’ 16.94” E	2	Air Bikuk Estate	ABKE	2° 46’ 27.67” S	101° 24’ 44.68” E	3	Air Buluh Estate	ABE	3° 01’ 27.29” S	101° 33’ 15.79” E	4	Malin Deman Estate	MDE	3° 01’ 27.29” S	101° 33’ 15.79” E	5	Koperasi Perkebunan Desa Air Buluh	KOPABA	3° 3’ 15.11” S	101° 29’ 53.43” E	Comply
No	FFB Origin	Scope	Latitude	Longitude																													
1	Bunga Tanjung Estate	BTE	2° 43’ 0.39” S	101° 22’ 16.94” E																													
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4	Malin Deman Estate	MDE	3° 01’ 27.29” S	101° 33’ 15.79” E																													
5	Koperasi Perkebunan Desa Air Buluh	KOPABA	3° 3’ 15.11” S	101° 29’ 53.43” E																													

		Agromuko (KOPABA)			
		6 Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	KPSB-MMAS	2° 58' 50.37" S	101° 35' 51.83" E
		7 KMD Mundam Marap	ABE	3° 01' 55.53" S	101° 31' 25.43" E
		8 KMD Air Buluh	ABE	3° 03' 21.19" S	101° 30' 59.60" E
		9 KMD Bukit Harapan	ABE	3° 02' 41.91" S	101° 36' 54.73" E
		10 KMD Dusun Pulau	ABE	3° 04' 35.40" S	101° 34' 22.57" E
		11 KMD Dusun Pulau	ABE	3° 04' 25.04" S	101° 34' 29.46" E
		12 KMD Medan Jaya	ABE	2° 59' 15.58" S	101° 39' 18.91" E
		13 KMD Pulau Baru	ABE	3° 02' 56.92" S	101° 29' 21.84" E
		14 KMD Sumendam	ABE	3° 01' 6.20" S	101° 31' 31.32" E
		15 KMD Talang Arah	ABE	2° 59' 4.50" S	101° 38' 38.31" E
		16 KMD Talang Baru	ABE	3° 00' 1.40" S	101° 32' 56.65" E
		17 KMD Talang Rio	ABE	3° 04' 59.76" S	101° 33' 15.88" E
		18 KMD Talang Rio	ABE	3° 04' 50.87" S	101° 33' 25.51" E
		19 KMD Tanjung Harapan	ABE	2° 59' 6.95" S	101° 39' 20.80" E
		20 KMD Air Berau	ABKE	2° 47' 11.15" S	101° 25' 21.28" E
		21 KMD Air Bikuk	ABKE	2° 47' 26.75" S	101° 23' 33.67" E
		22 KMD Pondok Sugh	ABKE	2° 47' 1.15" S	101° 26' 2.14" E
		23 KMD Nelan Indah	BTE	2° 44' 19.90" S	101° 23' 04.65" E
		24 KMD Bantal	BTE	2° 45' 24.86" S	101° 21' 05.55" E
		25 KMD Bunga Tanjung	BTE	2° 42' 38.42" S	101° 23' 55.08" E
		26 KMD Nenggalo	BTE	2° 44' 43.07" S	101° 21' 23.91" E
		27 KMD Pondok Baru	BTE	2° 43' 50.60" S	101° 21' 24.65" E
		B. Ownership/right status of FFB suppliers refer to indicator 4.4.1			
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the	Bunga Tanjung POM implementing IP model, so that all FFB suppliers coming into the Mill are from certified area. Bunga Tanjung POM did not received FFB from non-certified and indirectly sources.			N/A

	evidence as listed in Indicator 2.3.1.		
<p>PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4.</p>			
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p>	<p>PT Agro Muko and its subsidiaries – Consolidated Financial Statements for the Year ended December 31, 2018. It was available Independent Auditor’s Report No.00463/2.1097/AU.1/01/0568-3/1/IV/2019 by Satrio Bing Eny & Rekan – dated 26 Apr 2019. Report established by Parlindungan Siahaan, Public Accountant License No.AP.0568. In the report, stated “The accompanying consolidated financial statements present fairly, in all material respects, the financial position of PT Agro Muko and its subsidiaries as of December 31, 2018, and their financial performance and their cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.</p> <p>PT Mukomuko Agro Sejahtera and its subsidiaries (Malin Deman Estate and Air Manjunto Estate) – Consolidated Financial Statements for the Year ended December 31, 2018. It was available Independent Auditor’s Report No.00470/2.1097/AU.1/01/0568-3/1/IV/2019 by Satrio Bing Eny & Rekan – dated 26 Apr 2019. Report established by Parlindungan Siahaan, Public Accountant License No.AP.0568. In the report, stated “The accompanying consolidated financial statements present fairly, in all material respects, the financial position of PT Mukomuko Agro Sejahtera and its subsidiaries as of December 31, 2018, and their financial performance and their cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.</p> <p>PT. Agro Muko – Bunga Tanjung POM have prepared a business plan for period 2017 – 2027. The business plan updated on 1 November 2019 considering achievement since 2017 to Oct 2019. The business plan indicating the projected production of FFB, CPO and PK; cost of production, revenue and profit estimation. This figures including from the supply base of PT. Mukomuko Agro Sejahtera’s Estate and KMD. Below are projection of production 2019 – 2023 of Bunga Tanjung POM that include in the business plan updated 1 Nov 2019.</p>	Comply

Description	2019	2020	2021	2022	2023
FFB (Ton):					
Bunga Tanjung Estate	49,659	45,092	54,788	46,877	38,544
Air Bikuk Estate	14,033	15,492	14,406	13,824	19,470
Air Buluh Estate	53,755	48,914	50,079	46,064	38,605
KMD	4,645	4,650	5,008	5,029	5,051
MMAS	23,535	35,924	20,509	21,637	22,764
Total	145,627	140,072	144,790	133,431	124,434
CPO (Ton)	33,494	32,216	33,360	30,743	28,670
PK (Ton)	7,427	7,004	7,399	6,818	6,359
OER (%)	23.00	23.00	23.04	23.04	23.04
KER (%)	5.10	5.10	5.11	5.11	5.11
Processing Cost CPO (Rp/kg)	400	409	418	427	437
Processing Cost PK (Rp/kg)	92	94	96	98	100

Air Buluh Estate:
Business Plan Projection year 2019 – 2022:

	2019	2020	2021	2022	2023
FFB prod.	53,171	52,105	51,197	46,314	38,739
Mature Area	2,170.79	2,170.79	2,170.79	2,014.11	1,727.90
Cost (Rp/Kg)	448	476	503	537	573

The budget signed on 1 January 2019.

Air Bikuk Estate:
Business Plan Projection year 2019 – 2022:

	2019	2020	2021	2022	2023
FFB prod.	35,178	36,937	38,784	40,732	42,759
Mature Area	1,232.89	1,232.89	1,232.89	1,232.89	1,232.89
Cost (Rp/Kg)	835	835	835	795	777

The budget signed on 1 January 2019.

Budget for KMD Air Buluh demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	390	390	360	360	360
Area (Ha)	15.00	15.00	15.00	15.00	15.00

Budget for KMD Talang Baru demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	330	330	330	330	330
Area (Ha)	15.00	15.00	15.00	15.00	15.00

Budget for KMD Talang Arah demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	285	315	315	315	315
Area (Ha)	15.00	15.00	15.00	15.00	15.00

Budget for KMD Semundam demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	294	294	294	294	294
Area (Ha)	14.00	14.00	14.00	14.00	14.00

Budget for KMD Dusun Pulau demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	170	190	210	210	210
Area (Ha)	10.00	10.00	10.00	10.00	10.00

Budget for KMD Talang Rio demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	190	210	210	210	210
Area (Ha)	10.00	10.00	10.00	10.00	10.00

		<p>Budget for KMD Pulau Baru demonstrates Budget 2019-2023:</p> <table border="1"> <thead> <tr> <th></th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>FFB (Ton)</td> <td>225</td> <td>225</td> <td>225</td> <td>225</td> <td>216</td> </tr> <tr> <td>Area (Ha)</td> <td>9.00</td> <td>9.00</td> <td>9.00</td> <td>9.00</td> <td>9.00</td> </tr> </tbody> </table> <p>Budget for KMD Medan Jaya demonstrates Budget 2019-2023:</p> <table border="1"> <thead> <tr> <th></th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>FFB (Ton)</td> <td>180</td> <td>198</td> <td>198</td> <td>198</td> <td>198</td> </tr> <tr> <td>Area (Ha)</td> <td>9.00</td> <td>9.00</td> <td>9.00</td> <td>9.00</td> <td>9.00</td> </tr> </tbody> </table> <p>Budget for KMD Tanjung Harapan demonstrates Budget 2019-2023:</p> <table border="1"> <thead> <tr> <th></th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>FFB (Ton)</td> <td>180</td> <td>198</td> <td>198</td> <td>198</td> <td>198</td> </tr> <tr> <td>Area (Ha)</td> <td>9.00</td> <td>9.00</td> <td>9.00</td> <td>9.00</td> <td>9.00</td> </tr> </tbody> </table> <p>Budget for KMD Bukit Harapan demonstrates Budget 2019-2023:</p> <table border="1"> <thead> <tr> <th></th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>FFB (Ton)</td> <td>68</td> <td>77</td> <td>97</td> <td>106</td> <td>116</td> </tr> <tr> <td>Area (Ha)</td> <td>9.65</td> <td>9.65</td> <td>9.65</td> <td>9.65</td> <td>9.65</td> </tr> </tbody> </table>		2019	2020	2021	2022	2023	FFB (Ton)	225	225	225	225	216	Area (Ha)	9.00	9.00	9.00	9.00	9.00		2019	2020	2021	2022	2023	FFB (Ton)	180	198	198	198	198	Area (Ha)	9.00	9.00	9.00	9.00	9.00		2019	2020	2021	2022	2023	FFB (Ton)	180	198	198	198	198	Area (Ha)	9.00	9.00	9.00	9.00	9.00		2019	2020	2021	2022	2023	FFB (Ton)	68	77	97	106	116	Area (Ha)	9.65	9.65	9.65	9.65	9.65	
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The company has provided replanting program up to year 2030.</p> <p>Replanting program amended 01 Oct 2019:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Mukomuko</td> <td>394.23</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Sei Betung</td> <td>-</td> <td>-</td> <td>-</td> <td>74.67</td> <td>68.42</td> <td>72.32</td> <td>60.51</td> </tr> <tr> <td>Tanah Rekah</td> <td>218.52</td> <td>-</td> <td>462.55</td> <td>348.91</td> <td>426.41</td> <td>436.88</td> <td>222.27</td> </tr> <tr> <td>Talang Petai</td> <td>207.50</td> <td>-</td> <td>128.90</td> <td>105.58</td> <td>159.23</td> <td>143.44</td> <td>168.11</td> </tr> <tr> <td>Sei Kiang</td> <td>-</td> <td>-</td> <td>-</td> <td>213.03</td> <td>151.29</td> <td>208.92</td> <td>175.04</td> </tr> <tr> <td>Bunga Tanjung</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>280.37</td> <td>330.36</td> </tr> </tbody> </table>	Estate	2019	2020	2021	2022	2023	2024	2025	Mukomuko	394.23	-	-	-	-	-	-	Sei Betung	-	-	-	74.67	68.42	72.32	60.51	Tanah Rekah	218.52	-	462.55	348.91	426.41	436.88	222.27	Talang Petai	207.50	-	128.90	105.58	159.23	143.44	168.11	Sei Kiang	-	-	-	213.03	151.29	208.92	175.04	Bunga Tanjung	-	-	-	-	-	280.37	330.36	Comply																
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		<p>Annual review of replanting was conducted during management review. There is a letter from Agronomy Manager of PT Agromuko mention that replanting program 2020 will be postponed.</p>																	
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p>	<p>Each unit conducted Management Review. Latest Management Review in Air Buluh Estate conducted on 6 Nov 2019. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit conducted on 26 to 28 Sept 2019, corrective action have been reviewed, e.g. SPPL report of KMDs have been submitted to relevant agencies, ABE has reviewed and completed HIRADC. • Customer feedback; customer of ABE is BTPOM, BTPOM and its supply bases conducted regular EML Meeting with agenda FFB quality, loose fruit percentage and restan. • Process performance and product conformity. • Status of preventive and corrective actions; the meeting discussed preventive action and corrective action from latest internal audit. • Follow-up actions from management reviews. • Changes that could affect the management system; PT Agro Muko incorporation with PT Safeguarding Solution Indonesia (SSI) conducted security services in PT Agro Muko. • Recommendations for improvement; ABE incoordination with RMO will disseminated FFB Price to KMD earlier, although after all the Price is always good and no problem occur with KMD; communicate with KSU as provider of casual worker to established contract between KSU and the workers which they managed. <p>Latest Management Review in Air Bikuk Estate conducted on 29 Oct 2019. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit conducted on 20 to 21 Aug 2019, corrective action have been reviewed, e.g. repair of HGU pegs No.160 and 170; dissemination of company policy to all workers has been done; gender committee activities have been running. • Customer feedback; customer of Air Bikuk Estate is BTPOM, BTPOM and its supply bases conducted regular EML Meeting with agenda FFB quality, loose fruit percentage and restan. • Process performance and product conformity. • Status of preventive and corrective actions; the meeting discussed preventive action and corrective action from latest internal audit. 	Comply																

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...making excellence a habit.™

		<p>loose fruit and production achievements. Attendance list was available. EML AM-South discussed that FFB received for Sep 2019 are below target 13.47%, and todate Sep 2019 are below target 15.93%; OER achievement Sep 2019 is 24.09%, and todate Sept 2019 is 23.40%, compare to budget 23.00%; KER achievement in Sep 2019 is 5.19%, and todate Sep 2019 is 5.10%; Mill throughput in Sep 2019 is 30.83 ton/hour, and todate Sep 2019 is 30.11 ton/hour, compare to budget 30.00 ton/hour. Recommended that Mill shall keep control the losses below the determined parameter.</p>	
<p>Criteria 3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p>	<p>Internal audit has been conducted on 3 – 4 Sept 2019 in Air Buluh Estate; on 20 – 21 Aug 2019 in Air Bikuk Estate. Several finding have been recorded; consist of minor finding, Observation and Opportunity for Improvement. Internal Audit in Bunga Tanjung POM carried out on 30 – 31 Aug 2019. All 2019 Internal Audit are conducted refer to RSPO Principle and Criteria 2018.</p> <p>The company has established continual improvement program under “Program Perbaikan Berkelanjutan Tahun 2019”. The program monitored consist of Monitoring & Evaluation of Best Agricultural Practices; Monitoring & Management of agrochemical uses and handling of chemical waste; interview to the surrounding communities for social aspect; Mitigation of Green House Gasses; dissemination of conservation area including status of species (flora & fauna) protected, rare, threated and endangered.</p> <p>Bunga Tanjung Estate has conducted management and monitoring related to continuous improvement program 2019:</p> <ul style="list-style-type: none"> • Fertilizer application inspection; • FFB quality inspection; • Loose fruit inspection; • Record of pesticides uses; • Evaluation of water uses/ton FFB; • Evaluation of HSD Oil/unit; • HCV Monitoring Report by Ranger. 	Comply
3.2.2	As part of the monitoring and	The company has been reported Annual Communication of Progress (ACOP) 2019 to RSPO website under	Comply

	<p>continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.</p>	<p>organization name SIPEF Group, membership number 1-0021-05-000-00. Based on the report, number of management units certified under RSPO P&C Certification are 9 units; total certified area 97,018 Ha. Scheme Smallholder FFB volume supplied that is certified are 243,571 tonnes. Total CSPO sold as RSPO-certified are 261,374 tonnes; CSPO sold under other certification schemes are 63,399 tonnes; CSPO sold as conventional are 12,880 tonnes; total CSPO are 337,653 tonnes. CSPK sold under RSPO certified are 53,902 tonnes; total CSPK are 53,902 tonnes.</p>	
<p>Criteria 3.3 Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p>	<p>Estate: The procedures documented in "Oil Palm Agricultural Manual" (revised April 2019), where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport. Documented SOP are as follows: <ol style="list-style-type: none"> 1. OPM-01-00; dated 02/10/2017; Biology of Oil Palm. 2. OPM-02-00; dated 02/10/2017; General Information: Oil Palm Nursery. 3. OPM-02-01; dated 02/10/2017; Land Preparation of Oil Palm Nursery – Persiapan Lahan Pembibitan Kelapa Sawit 4. OPM-02-02; dated 02/10/2017; Oil Palm Pre Nursery – Pre Nursery Kelapa Sawit. 5. OPM-02-03; dated 02/10/2017; Oil Palm Main Nursery – Main Nursery Kelapa Sawit. 6. OPM-03-01; dated 02/10/2017; Survey and Mapping – Survey dan Pemetaan. 7. OPM-03-02; dated 02/10/2017; Land Clearing – Pembersihan Lahan. 8. OPM-03-03; dated 06/02/2019; Land Preparation – Persiapan Lahan. 9. OPM-03-04; dated 02/10/2017; Legume Cover Crop <i>Mucuna bracheteata</i> – <i>Mucuna bracheteata</i> Kacangan Penutup Tanah. 10. OPM-03-05; dated 02/10/2017; Field Planting – Penanaman ke Lapangan. 11. OPM-04-01; dated 02/10/2017; Palm Supplying – Penyisipan Tanaman. 12. OPM-04-02; dated 02/10/2017; Thinning Out and Removing Plant – Penjarangan dan pembongkaran Tanaman. 13. OPM-05-01; dated 06/02/2019; Ablation and Sanitation – Ablasi dan Sanitasi. 14. OPM-05-02; dated 06/02/2019; Harvesting – Panen. 15. OPM-05-03; dated 06/02/2019; FFB and LF Delivery – Pengiriman TBS dan Berondolan. </p>	<p>Comply</p>

16. OPM-05-04; dated 02/10/2017; Frond Pruning – Pemangkasan Pelepah.
17. OPM-05-05; dated 16/02/2019; Black Bunch Count – Sensus Buah.
18. OPM-05-06; dated 02/10/2017; *Elaeobius camerunicus* Management – Pengelolaan *Elaeobius camerunicus*.
19. OPM-06-01; dated 02/10/2017; Inorganic Fertiliser – Pupuk Inorganik.
20. OPM-06-02; dated 02/10/2017; Organic Fertiliser – Pupuk Organik
21. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman.
22. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel.
23. OPM-07-01; dated 06/02/2019; Detection and Census – Deteksi dan Sensus.
24. OPM-07-02; dated 02/10/2017; Pest Control – Pengendalian Hama.
25. OPM-07-03; dated 02/10/2017; Disease Control – Pengendalian Penyakit.
26. OPM-07-04; dated 02/10/2017; Integrated Pest Management – Pengendalian Hama Terpadu.
27. OPM-08-01; dated 06/02/2019; Weed Control – Pengendalian Gulma.
28. OPM-09-01; dated 19/03/2019; Water management in Coastal Soil – Pengelolaan Air di Tanah Pesisir.
29. OPM-09-02; dated 02/10/2017; Management of Riparian Area – Pengelolaan Riparian Area.
30. OPM-09-03; dated 01/04/2019; The Use, Store and Discrad Pesticide – Penggunaan, Penyimpanan dan pemusnahan pestisida.
31. OPM-10-01; dated 06/02/2019; Field Quality Control.

Interviews with the employees indicate satisfactory level of understanding and implementation in relation to their respective job function.

Bunga Tanjung POM:

Palm Oil Mill has a set of procedure for processing of oil palm Fresh Frut Bunch into CPO and PK, under "Palm Oil Mill Manual". The procedures explains all activity from receiving FFB into dispatch of products; Such as:

1. POM-01-03; Rev2; dated 25/03/2019; Reception in Agro Muko Palm Oil Mill.
2. POM-02-03; Rev2; dated 25/03/2019; Sterilizer in Agro Muko Palm Oil Mill.
3. POM-03-03; Rev1; dated 25/03/2019; Threshing in Agro Muko Palm Oil Mill.
4. POM-04-03; Rev1; dated 25/03/2019; Pressing in Agro Muko Palm Oil Mill.
5. POM-05-03; Rev1; dated 25/03/2019; Clarification in Agro Muko Palm Oil Mill.
6. POM-06-03; Rev3; dated 25/03/2019; Kernel Plant in Agro Muko Palm Oil Mill.

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		<p>7. POM-07-03; Rev1; dated 25/03/2019; Steam Plant in Agro Muko Palm Oil Mill. 8. POM-08-03; Rev1; dated 25/03/2019; Power Plant in Agro Muko Palm Oil Mill. 9. POM-09-03; Rev1; dated 25/03/2019; Water Treatment in Agro Muko Palm Oil Mill. 10. POM-10-03; Rev1; dated 25/03/2019; Effluent Plant in Agro Muko Palm Oil Mill. 11. POM-11-03; Rev1; dated 25/03/2019; Storage and Dispatch in Agro Muko Palm Oil Mill. 12. POM-12-03; Rev1; dated 25/03/2019; Workshop in Agro Muko Palm Oil Mill. 13. POM-13-03; Rev1; dated 25/03/2019; EFB Plant in Agro Muko Palm Oil Mill. 14. POM-14-03; Rev1; dated 25/03/2019; Biogas Plant in Agro Muko Palm Oil Mill. 15. MKT-03-06; dated 04/03/2019; Supply Chain and Traceability of Palm Oil.</p> <p>A set of work instruction for mill’s workshop are available, dated 25/03/2019; including use of welding equipments, cutting metal, operating lathe machine, operating drilling machine, operating portable grinding machine, operating and maintenance of smoke density meter.</p> <p>Engineering Procedures:</p> <p>1. ENG-01-01; Rev1; dated 28/03/2019; Civil Mechanical and Eelctrical Work. 2. ENG-02-01; Rev1; dated 28/03/2019; Weekly Prodcution Report. 3. ENG-02-03; Rev1; dated 28/03/2019; Monthly Prodcution and Stock. 4. ENG-02-14; Rev1; dated 28/03/2019; Material Dstribution From Storage. 5. ENG-02-16; Rev1; dated 28/03/2019; Resceiving HSD Oil. 6. ENG-02-21; Rev0; dated 07/03/2019; Weighing Administration. 7. ENG-03-01; Rev1; dated 28/03/2019; Master List of Measuring Equipment. 8. ENG-03-02; Rev1; dated 28/03/2019; Planning, Monitoring and Reporting of Calibration and Verification. 9. ENG-03-03; Rev1; dated 28/03/2019; Calibration Administration Excluding Weighbridge. 10. ENG-03-04; Rev1; dated 28/03/2019; Calibration Administration Weighbridge. 11. ENG-03-05; Rev1; dated 28/03/2019; Verification Administration Procedure.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	The company has established mechanism to check consistent implementation of procedures under SOP OPM-10-01; dated 06/02/2019; Field Quality Control. The objectives of the procedure are to check if the result of work are in accordance with existing procedures; to evaluate the work and keep in accordance with the standards; to use as a reference for making improvements. Inspections are carried out on items related to harvesting, weeding, manuring, pest and disease, replanting and nursery.	Comply

		<p>Vice President Engineering conducted regular visit to Bunga Tanjung POM periodically twice in a year. In 2019, visit conducted on 22 Mr 2019 and 6 Aug 2019. Action plan have been determined and completion status have been verified.</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available.</p>	<p>Record of monitoring in BUnga Tanjung POM are available under documents Action Plan Bunga Tanjung POM as result Vice President Engineering visit. Description of monitoring result and action plan based on visit August 2019.</p> <p>Data verified: Delivery of FFB from Field "SPB" No.3513 dated 11 November 2019 from Air Bikuk Estate, block J02a; planting year 1998, total 425 bunches. "Laporan Harian Pemeriksaan FFB – Air Bikuk Estate" dated 11 November 2019: time checked 15.04PM; SPB No.3513; planting year 1998; total bunches 425 (actual 420); unripe 2 bunches (0.47%); under ripe 28 bunches (6.66%); normal ripe 382 bunches (90.97%); over ripe 8 bunches (1.90%); empty 0 bunches (0%); long stalk 11 bunches (2.61%). Receiving slip/weighbridge ticket No.FFB19014061W, Air Bikuk Estate" dated 11 November 2019; D/O No.3513; block ID 98J02A; planting year 1998; total bunches 425; nett weight 7,250 kg.</p> <p>Record of monitoring in Estates are available under documents as follows:</p> <ol style="list-style-type: none"> 1. "Inspeksi Kualitas FFB" dated 8 Nov 2019, described inspection of FFB quality from Division 3, Block 99D01A. 2. "Inspeksi Brondolan" dated 8 Nov 2019, described inspection of loose fruit from Division 3, Block 99G01A. 3. Pest Detection dated 17 Oct 2019, described detection of pest at Division 4, Block 99M01A. document mentioned that there is no pest attack in all area of Division 4. 4. Based on "Control Hama", light attack of rat observed at Block 04Y01A on 17 Oct 2019; light attack of pig observed at Block 05Y03A on 18 Oct 2019; light attack of termite observed at Block 05Y04A on 19 Oct 2019. 5. Internal audit has been conducted on 3 – 4 Sept 2019 in Air Buluh Estate; on 20 – 21 Aug 2019 in Air Bikuk Estate. 6. "Inspeksi Pemupukan" dated 26 Jul 2019, described inspection of fertilizer application at Block 17A01, Division 1 Air Bikuk Estate, for Urea fertilizer, dosage 1.5 kg/palm. The report mentioned palm applied, circle condition, fertilizer applied equally, application radius comply to the recommendation. 	<p>Comply</p>

		<p>7. "Inspeksi Brondolan" dated 12 Jul 2019, described inspection of loose fruit at Block 98S02A, Division 3 Air Bikuk Estate, harvesting rounds: 9 days. The report mentioned bunches harvested, unpicked loose fruit, uncut frond, frond stacking, pruning quality.</p> <p>8. "Inspeksi Kualitas FFB" dated 6 Jul 2019, described inspection of FFB quality at Block 98V02, Division 3 Air Bikuk Estate, harvesting rounds: 9 days. The report mentioned total bunches harvested, unripe bunch, under ripe bunch, over ripe bunch, long stalk.</p> <p>9. "Inspeksi Immature Oil Palm" dated 3 Jul 2019, described inspection of immature oil palm at Block 17B01, Division 1 Air Bikuk Estate. The report mentioned palm condition: good, empty, yellow, dwarf, death, epiphyte and no access.</p> <p>Record of monitoring in Bunga Tanjung POM are available under documents as follows:</p> <ol style="list-style-type: none"> 1. "Laporan Harian Steriliser" dated 24 Oct 2019, described parameter checked in Steriliser Station, e.g.: time, steam pressure. 2. "Laporan Harian Klarifikasi" dated 24 Oct 2019, described parameter checked in Clarification Station, e.g.: time, total hour, temperature. 3. "Laporan Harian Steam Turbine" dated 24 Oct 2019, described parameter checked in Steam Turbine Station, e.g.: time, ampere, KW, Hz, V, RPM, Exhaust Steam Temperature, Cooling Water temperature, oil pressure, steam inlet turbine, back press steam. <p>Record of monitoring in Bunga Tanjung POM are available under documents Action Plan Bunga Tanjung POM. Description of monitoring result and action plan on 22 Mar 2019 are as follows:</p> <ol style="list-style-type: none"> 1. The bunch analysis lab has been upgraded to increase the FFB sampling from 4 samples per day to 10 samples per day. Closed on 5 Apr 2019. 2. The scrap metal area was very untidy and the scrap metal had fallen into the drains. Closed on 18 Apr 2019. 3. All the drain pipes from the digesters should be installed above a cone section, so the operator can see if the oil is flowing. Closed on 23 Apr 2019. <p>Description of monitoring result and action plan on 6 Aug 2019 are as follows:</p> <ol style="list-style-type: none"> 1. There is a lot of oil seen in the sludge pit and cooling pond as a result of oil loses, the mill manager should arrange to regularly skim this oil and recycle back to the process. Closed on 8 Aug 2019. 2. The dilution tank on line 1 is no longer in use and should be removed, along wit the water pipe. Closed on 12 Aug 2019. 	
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		<p>3. The coupling on the boiler feed water pump should be checked, as it sounds like the rubber bushing are worn out.</p>	
<p>Criteria 3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p>	<p>PT Agromuko – Mukomuko POM has demonstrated the document of Social-Environment Impact Assessment (SEIA) as per government document “Analisis Dampak Lingkungan (ANDAL) dan Rencana Pengelolaan dan Pemantauan Lingkungan (RKL-RPL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit dan Karet di Kecamatan Mukomuko Utara, Kecamatan Lubuk Pinang, Kecamatan Teras Terunjam dan Kecamatan Pondok Suguh, Kabupaten Mukomuko, Propinsi Bengkulu, tahun 2005” - it was found that the document prepared with public consultation process, involving stakeholders from surrounding community, government bodies, traditional leaders.</p> <p>Aside from that, certificated holder has prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI), in 2010 and 2011. The scope of social impact assessment covers 15 villages around company including Kebun Masyarakat Desa/KMD of 524 Ha from 38 surrounding villages.</p> <p>PT Mukomuko Agro Sejahtera – Mukomuko POM has also prepared the document, identifying Social-Environment Impact Assessment (SEIA) under document: “Dokumen AMDAL untuk Kegiatan Perkebunan Kelapa Sawit seluas 6,298 Ha di Kecamatan Malin Deman, Kecamatan Ipuh dan Kecamatan V Koto, Kabupaten Mukomuko, Provinsi Bengkulu”. The document was approved by “Surat Keputusan Gubernur Bengkulu No. M.288.XXX Tahun 2011” dated 9 September 2011.</p> <p>Aside from that, company has prepared a social-environment impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The report under Dokumen Laporan Final Penilaian Dampak Sosial dan Lingkungan yang dilaksanakan oleh Yayasan Kelapa Sawit Berkelanjutan (YASBI) pada tahun 2011 yang dilakukan terhadap dampak sosial dari pembangunan kebun inti dan rencana pembangunan Kebun Masyarakat Desa (KMD)”. For Kebun Masyarakat Desa, in 2010, the certificated holder has also prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The scope of social-environment impact</p>	<p>Comply</p>

		<p>assessment covers 15 villages around company including Kebun Masyarakat Desa/KMD of 524 Ha from 38 surrounding villages.</p> <p>In 2017, social-environment impact assessment held in cooperation by Kompas Enviro Institute for scope of 10 KMDs. The social impact assessment was done between 8-16 March 2017 with scope of 15 villages around KMD with focus group discussion (FGD).</p> <p>The result from social impact monitoring reported in "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan-Rencana Pemantauan Lingkungan(RKL-RPL)" period first semester 2019. The report has been submitted to "Dinas Lingkungan Hidup Kabupaen Mukomuko", "Gubernur Bengkulu", "Kepala Badan Lingkungan Hidup Provinsi Bengkulu", "Kepala Dinas ESDM Provinsi Bengkulu", "Bupati Mukomuko Cq Kepala Dinas Penanaman Modal", "Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko".</p> <p>During this surveillance (ASA 1.4 – year 2019), there was no significant changes in social impact practices. The certificate holder still involved affected parties to collect information and develop the social program/plan to mitigate negative impact.</p> <p>Based on interview with representative of smallholder scheme (KMD), it is clearly informed that Certificate Holder are often to open discuss related how to minimizing negative impact in social aspect.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p>	<p>The social impact management plan from documents have lined out program to manage and monitors social-environment impact (e,.g: Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan (RKL-RPL for period first semester year 2019), timeframe and person in charge. The plan was consulted through questionnaire/survey to surrounding communities on 6-monthly basis. Progress of implementation was monitored, evaluated and reported to government on 6-monthly basis.</p> <p>Within the AMDAL documents, the negative and positive impact of oil palm development has been explained. The environmental management and monitoring plan document has lined out effort that company should carry out in order to minimize negative impact and promote positive impact from oil palm development. Under the document, the social aspect identified covers source of livelihood, community's revenue, community ability, community perception on company activity, social conflict, social-cultural changes, community health status.</p> <p>The Social-Environment Impact Assessment documents have explained the recommendation that should be</p>	Comply

		<p>done by company to minimize negative impact and promote positive impact from social impact management.</p> <p>As commitment to reduce negative impacts in social aspect, the certificate holder created management and monitoring program of social impact annually.</p> <p>Documented sample of management and monitoring program social-environment impact PT Agromuko – Mukomuko POM report in July 2019. There are six (6) major program where focused on, such as:</p> <ul style="list-style-type: none"> • Tenure • Communication with Affected Parties, • Community Empowerment • Economic, • Fire and Haze Prevention, • Environmental Management • Scheme Smallholders (KMD) management (e.g: socialization of KMD development plans; review the location of smallholder plantation location – to ensure consensus and involvement of all parties within village scope; coordination with government related to SPPL. <p>Those program are documented and timetable with specific target and strategy of each activities.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p>Certificate holder have carried out social impact evaluation on annual basis through social survey. The survey was conducted by ENC-AM/MMAS and being part of environment management and monitoring report - "Laporan Pelaksanaan RKL-RPL".</p> <p>Review on social-environment management and monitoring has conducted year 2019 under "Laporan Hasil Kuisisioner dengan Masyarakat untuk Aspek Sosial" PT Agromuko – year 2019.</p> <p>Survey was conducted on 15 to 30 March 2019 total respondent is 160 people in 40 villages in surrounding the company.</p> <p>Aspect for the survey such as:</p> <ul style="list-style-type: none"> • Livelihood • Local community perception of employment opportunities • Income per month • Mobility • Local community perception related to operational activities in PT Agromuko 	Comply

		<p>Interview result have been summarized and recorded onto "Laporan Pelaksanaan RKL-RPL period first semester year 2019".</p> <p>For management plans in Kebun Masyarakat Desa/KMD, the social impact was carried out as part of company activity, because the smallholder plantation was managed by company. As explained from PT. Agro Muko and PT. Mukomuko Agro Sejahtera's social monitoring, the current management plan is still relevant – in terms of smallholder management.</p> <p>Malin Deman Estate and Air Buluh Estate: "Rencana Pengelolaan dan Pemantauan Dampak Sosial 2019", there is 6 important social program planned in 2019. The implementation and monitoring of social impact in 2019 conducted through questionnaire to community (involving affected stakeholders) related social aspect. Questionnaire result available in "Laporan Hasil Kuesioner dengan Masyarakat Untuk Aspek Sosial, 9 July 2019". Survey conducted within 15-30 March 2019 containing 40 villages and involving 165 respondent.</p> <p>Bunga Tanjung Estate: Reference to the social aspects measured for the questionnaire with the community refers to the AMDAL matrix. The social aspects surveyed included: ECONOMIC ASPECTS: Livelihoods, Population Perceptions of Employment Opportunities, Income of Villagers. Aspects of Population Mobility after the existence of PT. Agro Muko: Easy (85.45%); Not Easy (2.42%); Don't Know (12.12%). SOCIAL CULTURE aspects of the impacts of Oil Palm Plantation activities: Positive (92.12%); Negative (0.61%); None (2.42%); Don't Know (4.85%). Company Relations with Villagers: Good (87.88%); Just ordinary (12.12%). COMMUNITY HEALTH & ENVIRONMENTAL aspects. Perceptions about Environmental Pollution: No pollution (86.67%); There is pollution (13.33%). Types of Diseases Often Affected by Villagers: Diarrhea (12.12%); Skin (15.15%); Respiration (14.55%); Others (58.18%). Impact of Palm Oil Mill Activities on Public Health: Yes (5.45%); No (94.55%). The results of the questionnaire were evaluated internally by ENC-AM with the following output suggestions:</p> <ul style="list-style-type: none"> • Community input, hopes and perceptions are used as a source of information and material for communication and consultation with stakeholders. 	
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		<ul style="list-style-type: none"> • Requests are evaluated for eligibility, responded to, recorded and responded to if there were requests for information according to communication procedures. • Requests that we should respond to include requests for counseling on the management of oil palm plantation which is good and right. 	
Criteria 3.5 A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.	In general, the unit of certification has issued "Human Resources Department Manual" Second Edition – 2019 signed by President Director. Document available at the OU office, and accessible. The HRD Manual consist of 30 Standard Operating Procedure, among others: <ul style="list-style-type: none"> • General (Doc. No. HRD-00-01/01-02-2019/Rev.1) dated 8 April 2019. • Organization Chart (Doc. No. HRD-00-02/01-02-2019/Rev.1) dated 5 April 2019. • Objective and KPI (Doc. No. HRD-00-03/01-04-2019/Rev.1) dated 8 April 2019 • Risk and Opportunities (Doc. No. HRD-00-04/01-04-2019/Rev.1) dated 8 April 2019. • Recruitment in General (Doc. No. HRD-01-00/01-04-2019/Rev.1) dated 5 April 2019. • Internal Recruitment (Doc. No. HRD-01-01/01-04-2019/Rev.1) dated 8 April 2019. 	Comply
3.5.2	Employment procedures are implemented and records are maintained.	Employment records are well maintained by the HRD, for example: <ul style="list-style-type: none"> • Employee Promotion Application Letter from PKWT (temporary) to SKU-H (permanent) on 30 September 2018 as stated by Estate Manager letter No. 080/MDE-RMO/IX/2019. The letter completed with the name of the employee proposed for appointment, Assessment Results of each employee, Statement letter of each employee, Types of training that have been attended by each employee, Job and Responsibilities of each employee at the time of appointment. Mechanism on appointment of PKWT become SKU are based on Letter from HRAD No.02/HRAD-C-CIR/I/18 dated 19 January 2018 concerning Promotion/Appointment of Employees. Appointment of employees is completed with a Work Agreement (SPK), and Medical Check Up Results. • Regular employee appraisals are carried out annually, which outlines the results of assessments on 10 categories such as Ability, Responsibility, Cooperation with others, hard worker, open, trustworthy/honest, discipline, timeliness in carrying out tasks, administration and loyalty. • A record of MrAgus Siswanto work transfer from Air Buluh Estate transfer to Air Bikuk Estate in accordance with the Letter of Transfer No.14/GMO-ABE/IX/18 dated 6 September 2018. 	Comply
Criteria 3.6			

An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT Agromuko – Bunga Tanjung POM has established an Occupational Health and Safety Policy that was signed by President Director dated 27th March 2019, no Dok: QMM-40-01-P04/27-03/2019/Rev.</p> <p>In point 1 was mentioned PT Tolan Tiga Indonesia Support the implementation of all relevant laws and regulation of Republic of Indonesia ad of applicable international agreement and standards relevant to occupational health and safety.</p> <p>In point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>The company has prepared the procedure for OHS under document of Occupational Health and Safety Manual for second edition – 2019, published date 13th March 2019.</p> <p>The document of procedure consisted of:</p> <ol style="list-style-type: none"> 1. Procedure of Hazard Identification Risk Analysis Determining Control for OHS – No: OHS-01-01 2. Procedure of Hot Work – No: OHS-01-02 3. Procedure of Potential Hazard Report – No: OHS-01-03 4. Procedure of P3K (First Aid) – No: OHS-01-04 5. Procedure of Confined Space - No: OHS-01-06 6. Procedure of Working at Heights – No: OHS-01-06 7. Procedure of Gas Pressure Management - No: OHS-01-07 8. Procedure of Incident Reporting - No: OHS-01-08 9. Procedure of Standard for Installation of Safety Sign - No: OHS-01-09 10. Procedure of Personal Protective Equipment - No: OHS-01-10 <p>The certificate holder has prepared the document of risk assessment available under “Penilaian Risiko (Hazard Identification Risk Assessment and Control”, last review on 19th September 2019. The document has covered for all activities in Estate and Mill, e.g: general activities, central clinic, fertilizer storage, temporary storage of hazardous waste, security, chemical shed, office, workshop, field (spraying, manuring, harvesting, transport FFB, IPM), emplacement, laboratory, weighbridge, grading station, loading ramp, sterilizer station, chain</p>	Comply

		<p>capstand, pressing station, boiler station, kernel station, static crane, workshop.</p> <p>The document of risk assessment available under "Penilaian Risiko (Hazard Identification Risk Assessment and Control", last review on 19th September 2019 in Bunga Tanjung POM and last review on 16th April 2019 in Air Bikuk Estate.</p> <p>The document has covered for all activities in Estate and Mill, e.g: general activities, central clinic, fertilizer storage, temporary storage of hazardous waste, security, chemical shed, office, workshop, field (spraying, manuring, harvesting, transport FFB, IPM) and emplacement.</p> <p>Bunga Tanjung POM has prepared the document of HIRADC as per "Penilaian Risiko", last review on 5th April 2019. The document was covered all activities in POM, e.g: general activity, laboratory, weighbridge, grading station, loading ramp, sterilizer station, chain capstand, pressing station, boiler station, kernel station, static crane, temporary hazardous waste.</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>PT Agromuko – Bunga Tanjung POM has prepared the program of OHS year 2019 and has shown the monitoring of effectiveness as per document "Program P2K3LHS (safety committee) Tahun 2019", such as:</p> <ol style="list-style-type: none"> 1. OHS meeting (monthly) 2. Report of OHS performance to Manpower Agency (threes month base) 3. Routine inspection of OHS facilities (fire extinguisher and first aid box); 4. Integrated fire drill (annually); 5. Training for first aider (annually); 6. Training on hazardous waste both of handing and documentation; 7. Review of risk assessment; 8. General Medical Check Up (annually) and Special Medical Check Up (per threes month base) 9. Socialization of healthy life (every month) <p>The record of effectiveness of implementation the OHS program, e.g:</p> <ol style="list-style-type: none"> 1. Record of OHS meeting dated 2nd November 2019, location in Air Buluh Estate, agenda: Review of the meeting result of the last, review of OHS inspection and review of incident report 2. Report of OHS performance for period July – September 2019 was sent to Manpower Agency in Bengkulu 	Comply

		<p>Province both for Air Buluh Estate and Malin Deman Estate.</p> <p>3. Attendance list on socialization of Risk Assessment document, e.g:</p> <ul style="list-style-type: none"> Air Buluh Estate, was conducted on 7th October 2019 and 2nd November 2019, was attended by all workers Malin Deman Estate, was conducted on 27th March 2019, location in Division Inti <p>4. Special Medical Check Up for workers in high risk area (spraying, fertilizer and chemical handling) – per threes month base, e.g:</p> <ul style="list-style-type: none"> Air Buluh Estate: last MCU was conducted in September 2019, attended by 28 workers of spraying. The result was communicated to all workers. Malin Deman Estate: last MCU was conducted by Estate Clinic in September 2019, attended by 22 workers of Spraying activities. Report of Medical Check Up (annually), last MCU was conducted on 25th September 2019 by Company Doctor and Laboratorium Klinik Kesehatan Sepsialis Anugerah Ibu – Medan, attended by workers in Air Buluh Estate was 45 workers and in Malin Deman Estate was 25 workers <p>Bunga Tanjung Estate:</p> <p>1. Review of effectiveness the OHS plan was conducted by routine inspection of implementation the OHS program, e.g:</p> <ul style="list-style-type: none"> Checklist of availability the first aid kit, dated 8th September 2019; result shown OK Checklist of readiness the fire extinguisher facilities dated 8th November 2019; result shown OK Checklist of availability the PPE in warehouse, chemical storage, engine room (generator room), dated 8th November 2019; result shown OK. <p>2. The report of OHS inspection has reviewed during OHS meeting (monthly basis), last meeting dated 11th November 2019, location in Tennis yard. Agenda: review the progress action of the result last OHS meeting, review of the report of OHS inspection, etc.</p>	
<p>Criteria 3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders</p>	<p>PT Agromuko – Bunga Tanjung POM has shown the document of Training Program year 2019.</p> <p>Air Buluh Estate and Malin Deman Estate, Training program provided as per “Program Pelatihan/Training Tahun 2019”, prepared on 4th January 2019,</p>	Comply

	<p>and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p>	<p>such as:</p> <ul style="list-style-type: none"> • Training on harvesting (including for OHS aspect and harvesting quality criterion), was conducted on 2nd March 2019 in Air Buluh Estate and on 15th January 2019 in Malin Deman Estate • Training for spraying applicator (including for OHS training and environment) and Calibration for Spraying tools, was conducted on 9th March 2019 location in Air Buluh Estate • Training for manuring application (including OHS and environmental aspect), dated 6 & 7 February 2019 location in Malin Deman Estate; dated 9th April and 2nd November 2019 location in Air Buluh Estate • First Aid training, conducted on 10th and 11th October 2019 location in Malin Deman Estate and Air Buluh Estate • Refreshment training on implementation of RSPO requirement, date 1st July 2019, location in Air Buluh Estate • Training on handling of hazardous waste (including MSDS and hazard label), dated 14th March 2019 location in Malin Deman Estate and on 7th November 2019 location in Air Buluh Estate • Training on emergency respond (training on land fire emergency), dated 9th February and 19th September 2019, location in Malin Deman Estate and Air Buluh Estate. <p>Bunga Tanjung Estate: Estate has shown the document of Training Program year 2019, consisted of:</p> <ul style="list-style-type: none"> • Training for harvester (including: OHS aspect in harvesting activities) planned in March 2019; actual realization in 2nd April 2019. Attended by harvester • Training for first aider; planned in October 2019 • Refreshment training on safety riding (drivers: dump truck, tractor, heavy equipment, school bus and L300) planned in June 2019; actual realization on 27th August 2019, attended by drivers • Refreshment training on maintenance of generator (genset); realization on 22nd June 2019; was attended by generator operator • Refreshment training of MSDS and chemical handling, dated 15th February 2019, was attended by storage keeper in chemical and fertilizer. • Training for spraying applicator (including OHS aspect), dated 9th April 2019; attended by all operator for spraying • Training on procedure on operating the fire equipment and land fire simulation/drill, dated 23rd September 2019, was attended by 28 workers (staff, supervisor and field workers). Documentation and attendance list has shown. 	
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		<p>Air Bikuk Estate – record of training realization:</p> <ul style="list-style-type: none"> • Certificate of technical training of the Occupational Safety and Health Engineering on the field of lifting and transport equipment, namely Mr Juniardus Samosir (operator of farm tractor) – serial number: 15894/OPK3/PAA-LT/XI/2016, dated 23th November 2016, • OHS license for operator of heavy equipment, serial number: 14.1474-OPK3-PAA/II/2014, namely Mr Agus Sukirno. 	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p>	<p>Record of training has shown for an individual basis as per document of "Employee Training and Education Record", e.g:</p> <p>Air Buluh Estate, Namely Mrs Mimarni (spraying applicator) – 35 years old; training record:</p> <ul style="list-style-type: none"> • Dated 23rd January 2018; training on preparedness of emergency response for land fire • Dated 19th February 2018; training on calibration of sprayer equipment • Dated 7th March 2018; training on pesticides handling • Dated 12th Apeil 2018; training for MSDS • Dated 8th May 2018; training of OHS • Dated 20th October 2018; training pesticides handling • Dated 9th February 2019; training on emergency response for land fire • Dated 21st February 2019; Refresh training for MSDS • Dated 7th October 2019; Training for IPM • Dated 25th October 2019; Refresh training on chemical application <p>Namely Mr Teguh A (harvester) – 24th years old; training record:</p> <ul style="list-style-type: none"> • Dated 8th February 2018; training on quality of FFB • Dated 4th April 2018; Refresh training of OHS in harvesting activity • Dated 24th October 2019; Refresh training on implementation of harvesting procedure <p>Namely Mrs Sulasmi (reference number: 0547 – pesticides applicator/sprayer), division F.4 in Bunga Tanjung Estate; training record:</p> <ul style="list-style-type: none"> • Dated 24th March 2012; training or socialization of HCV area • Dated 16th January 2013; training on fertilizer application 	Comply

		<ul style="list-style-type: none"> • Dated 1st July 2014; refresh training on fertilizer application • Dated 4th March 2015; training for pesticides application • Dated 22nd February 2017; training on calibration of kap/SA15 • Dated 7th November 2017; refresh training on application of pesticides and calibration • Dated 13th August 2018; refresh training on application of pesticides and calibration • Dated 23rd April 2019; refresh training on application of pesticides and calibration <p>Employee training and education record namely Mrs Nusryasin (supervisor in pesticides applicator), e.g:</p> <ul style="list-style-type: none"> • Dated 18th September 2019; refresh training on handling of pesticides including OHS aspect in chemical application • Dated 26th February 2019; refresh training of MSDS for chemical material • Dated 7th February 2019; refresh training on calibration of spraying equipment • Dated 8th March 2019; training on earthquake simulation and preparedness • Dated 17th April 2018; training of awareness of HCV • Dated 14th May 2018; socialization of company's policy • Dated 17th January 2019; training on environmental impact in plantation. 	
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>PT Agromuko has provided appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS)</p> <p>Mr. Subhan (Manager): Training Supply Chain & Traceability RSPO (18 October 2018); Training Supply Chain & Traceability (5 November 2019);</p> <p>Padri Hutasuhut (Office Assisstant): Training Access Control Procedure & ID card (29 October 2019), Training Supply Chain & Traceability (5 November 2019);</p> <p>Harits Nasution (Tank Assisstant): Training Boiler Mechmar (7 November 2018); QMS ISO9001:2015 (22 June 2019), Training Supply Chain & Traceability (5 November 2019);</p> <p>Hendri Yanto (Power Plant): Training Supply Chain & Traceability (5 November 2019);</p> <p>Nila Dwi Putri (Officer Clerk): Training Dirt content & material (20 March 2018), Training Supply Chain & Traceability RSPO (18 October 2018); Training Supply Chain & Traceability (5 November 2019);</p> <p>Ilham Akbar (Weighbridge): Training Supply Chain & Traceability RSPO (18 October 2018); Training Access Control Procedure & ID card (29 October 2019), Training Supply Chain & Traceability (5 November 2019);</p> <p>BTPOM:</p>	Comply

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		<p>Latest training on "Supply Chain and Traceability" performed on 4 July 2019 attended by Office Assistant, production clerk, weighbridge operator and security officer. In total 7 personnel attending the training. Training module sighted, e.g. RSPO P&C 2018 (Generic). <i>Employee Training and Education Record</i> described that Candra Dewi (Weighbridge Clerk) has received: Training P&C 2018 on 4 July 2019; Training work instruction weighbridge on 11 April 2019; RSPO Supply Chain training on 2 November 2018, 1 November 2017 and 15 August 2018. <i>Employee Training and Education Record</i> described that for Mulyono (Mill Assisstant) has received RSPO P&C (incl. supply chain) training on 4 July 2019; and 23 November 2016.</p> <p>Bunga Tanjung Estate: RSPO SCCS Training for FFB checker in Bunga Tanjung Estate, Division I – Rudi Septiadi and Luddin P. <i>Employee Training and Education Record</i> described that for Rudi Septiadi (FFB checker) has received RSPO SCCS training on 17 September 2019; received training Harvesting and FFB quality on 11 April 2019. <i>Employee Training and Education Record</i> described that for Luddin P (FFB checker) has received RSPO SCCS training on 17 September 2019; received training Harvesting and FFB quality on 11 April 2019</p>	
<p>Supply chain requirements for mills. Procedural note: The below numbering is as per the current RSPO SCCS standard and will be renumbered to become 3.8 and onwards following the revision of the RSPO SCCS in 2019. 'D' therefore refers to RSPO SCCS 'Module D – Crude Palm Oil (CPO) mills: Identity Preserved' and 'E' to RSPO SCCS 'Module E – CPO mills: Mass Balance'. Depending on the supply chain model chosen, the corresponding requirements apply as well as all general requirements (those with numbers only). The RSPO SCCS document uses the terms 'site' and 'organisation' to refer to the unit of certification.</p>			
<p>Definition</p>			
<p>Identity Preserved Mill D.1</p>	<p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is</p>	<p>Management decided PT. Agro Muko – Bunga Tanjung POM, to implement RSPO Supply Chain Module D CPO Mills: Identity Preserved. With the implementation of Module D CPO Mills: Identity Preserved, the POM only received and process FFB from certified company-owned estate and certified smallholder/KMD. Agro Muko Tank Terminal (AMTT) is deemed as part of the palm oil mill. The control over tank terminal (bulking station) is under PT. Agro Muko. Agro Muko Tank Terminal is only receiving CPO from certified palm oil mills under PT. Agromuko, which is Mukomuko POM and Bunga Tanjung POM. Bunga Tanjung POM and AMTT implemented the procedure of supply chain and traceability based on The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, CPO shipping to</p>	<p>Comply</p>

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	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 Module E is applicable.	tank terminal; Receiving and shipping of CPO from tank terminal. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager, whilst in the tank terminal is the storage tank manager.	
Mass Balance Mill E.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Management decided PT. Agro Muko – Bunga Tanjung POM, to implement RSPO Supply Chain Module D CPO Mills: Identity Preserved. With the implementation of Module D CPO Mills: Identity Preserved, the POM only received and process FFB from certified company-owned estate and certified smallholder/KMD. Not applicable.	N/A Not Applicable
Explanation (Volume and product integrity)			
D.2 E.2	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	The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. Bunga Tanjung POM received certified raw material (Fresh Fruit Bunch) from its own estate: Air Bikuk Estate, Bunga Tanjung Estate, Air Buluh Estate; Malin Deman Estate; and from the Scheme Smallholders: Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU; Koperasi Produksi Plasma. Kebun Masyarakat Desa/KMD, Koperasi Serba Usaha/KSU and Koperasi Produksi Plasma are fully managed by	Comply

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	<p>certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	<p>PT. Agro Muko, under each estate. The certification of Estates and Scheme Smallholders are fall under PT. Agro Muko – Mukomuko POM with certificate number RSPO 646338, first certification start on 22 February 2011, second certification start on 22 February 2016 and expired on 21 February 2021. PT. Agro Muko – Bunga Tanjung Palm Oil Mill has been registered in RSPO IT Paltform with registered ID number RSPO_PO1000001279.</p>	
<p>5.3 Documented procedures</p>			
<p>5.3.1 D.3 E.3</p>	<p>The site shall have written procedures and/or work instructions 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"> • Complete and up to date procedures covering the 	<p>PT. Agro Muko has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure are complete and up to date covering the implementation of all elements in the supply chain requirements, such as:</p> <ol style="list-style-type: none"> a. Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information of supply chain mechanism; b. Process at the estates, covers harvesting, FFB and loose fruit delivery include harvesting record and delivery to the Palm Oil Mill; c. Process at Palm Oil Mill, covers FFB and Loose fruit receiving, identification, production process, delivery of product and recording. 	<p>Comply</p>

	<p>implementation of all the elements of the supply chain model requirements.</p> <ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • 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 organisation's procedures for the implementation of this standard. • The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 	<p>Agro Muko Tank Terminal (AMTT) is deemed as part of the palm oil mill. The control over tank terminal (bulking station) is under PT Agro Muko. Agro Muko Tank Terminal is receives CSPO from certified palm oil mills under PT. Agro Muko, which is Mukomuko POM and Bunga Tanjung POM. AMTT uses the same procedure with Mukomuko POM.</p>	
5.3.2 Internal Audit			
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p>	<p>Procedure for Internal Audit refer to SOP Routine Visit and Internal Audit No.ENC-01-02/04-03-2019/Rev.2 date 18 March 2019. Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to.</p>	Comply

	<ul style="list-style-type: none"> • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • Effectively implements and maintains the standard requirements within its organisation. <p>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 organisation shall be able to maintain the internal audit records and reports.</p>	<p>Section 5.4 Implementation of Routine/Internal Audit Visits stipulates: <i>In general, non-conformities in each of the principle and criteria, rules and requirement of the sustainable system are categorized under major, minor and observation. Such findings must be immediately followed up. The unit manager may undertake to implement corrections and may also plan improvements according to result of internal audit. Recommended improvement must be completed with timeframe. A review of the non-compliance found in a previous internal audit should be made on the next visit.</i></p> <p>Internal audit programme for PT. Agro Muko, based on invitation No.18/RMO-AM/ENC/M/VII/2019 dated 29 July 2019. PT. Agro Muko-Bunga Tanjung POM and its supply base audited on 13-31 August 2019.</p> <p>Evident: "Laporan Kunjungan" – Internal audit visit report for Bunga Tanjung POM, dated 30-31 August 2019. Internal auditor from ENC team (Robinson Gultom, Eka Bima S, Sri Dewi H, Deny Arfan S). Internal audit covers indicator 3.7.4, 3.8. Based on internal audit report, there was no nonconformities raised.</p> <p>Management review dated 4 November 2019 – (10 personnel including Mukomuko POM Manager) as recorded in minutes of meeting:</p> <ul style="list-style-type: none"> • Result of internal audits, covering RSPO Supply Chain Certification Standard: Internal audit for Mukomuko POM carried out on 7-8 September 2019, resulting 2 observation issued, all findings closed. • Customer feedback: No complaint received related to CSPO and/or CSPK product. • Status of preventive and corrective actions: status of preventive and corrective action related to internal audit have been discussed during management review meeting. This including opportunity for improvements. • Follow-up actions from management reviews: To continue consistent implementation of RSPO SCCS for CPO Mill: continued awareness on the requirements and control documented in Supply Chain Certification SOPs and implementatoin of the process on the ground. • Changes that could affect the management system: additional function of safeguarding from PT. SSI – including inspection and checking for transporter. • Recommendations for improvement: <ul style="list-style-type: none"> - Propose new work instruction related to FFB delivery and stamping. - Immediate application for expiring license/permit. <p>The management review output, as recorded in minutes of management review meeting dated 4 November 2019:</p>	
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		<p>Improvement of the effectiveness of the management system and its processes:</p> <ul style="list-style-type: none"> - Coordinating with Marketing Department for buyer satisfaction evaluation. - Resources needs: the PT. Agro Muko is committed to continue provision of adequate and relevant resources for the implementation, maintenance and improvement of RSPO SCCS requirement. 	
5.4 Purchasing Goods In			
<p>D.4.1/ D.4.2 E.4.1/E.4.2</p>	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<p>Air Bikuk Estate: Delivery FFB from Field No.ABKE/3513 dated 11 November 2019; Air Bikuk Estate, block 98J02A; Vehicle BD8361N; Year of planting 1998; qty. 425 bunches; stamped as Certified Product – IP, RSPO certificate No. RSPO 646338. FFB Receiving Slip Ticket No.FFB19014061W dated 11 November 2019 issued by Bunga Tanjung POM, Estate: Air Bikuk Estate; Vehicle BD8361N; Transporter: Air Bikuk Estate; Product: FFB; DO No. ABKE/3513; Nett weight: 7.25 MT; stamped as Certified Product – IP, RSPO certificate No.RSPO 646338.</p> <p>Bunga Tanjung Estate: Delivery FFB from Field No.BTE/37237 dated 11 November 2019; Bunga Tanjung Estate, block 98J02A; Vehicle BD9476EJ; Year of planting 1998; qty. 210 bunches; stamped as Sustainable Product – IP, RSPO certificate No.RSPO646338. FFB Receiving Slip Ticket No.FFB19014046W dated 11 November 2019 issued by Bunga Tanjung POM, Estate: Bunga Tanjung Estate; Vehicle BD9476EJ; Transporter: Bunga Tanjung Estate; Product: FFB; DO No.BTE/37237; Nett weight: 4.11 MT; stamped as Certified Product – IP, RSPO certificate No.RSPO 646338.</p> <p>Air Buluh Estate: Delivery FFB from Field No.ABE/209441 dated 11 November 2019; Air Buluh Estate, block 98V01A; Vehicle BD8208N; Year of planting 1998; qty. 592 bunches; stamped as Sustainable Product – IP, RSPO certificate No.RSPO646338. FFB Receiving Slip Ticket No.FFB19014070W dated 11 November 2019 issued by Bunga Tanjung POM, Estate: Air Buluh Estate; Vehicle BD8208N; Transporter: Air Buluh Estate; Product: FFB; DO No.ABE/209441; Nett weight: 12.12 MT; stamped as Certified Product – IP, RSPO certificate No.RSPO 646338.</p> <p>Malin Deman Estate: Delivery FFB from Field No.MDE/6705 dated 11 November 2019; Malin Deman Estate, block 12F01, 12F02, 12D02, 12D03; Vehicle BD8562N; Year of planting 2012; qty. 1,230 bunches; stamped as Sustainable Product – IP, RSPO certificate No.RSPO646338. FFB Receiving Slip Ticket No.FFB19014085W dated 11 November 2019 issued by Bunga Tanjung POM, Estate: Malin Deman Estate; Vehicle BD8562N; Transporter: Malin Deman Estate; Product: FFB; DO No.MDE/06705; Nett weight: 11.14 MT; stamped as Certified Product – IP, RSPO</p>	<p>Comply</p>

		<p>certificate No.RSPO 646338.</p> <p>Kopaba: Delivery FFB from Field No.PLAB/6850 dated 8 November 2019; Koperasi Plasma Air Buluh; Vehicle BD8828CN; Year of planting 2012; qty. 1025 bunches; stamped as Sustainable Product – IP, RSPO certificate No.RSPO646338. FFB Receiving Slip Ticket No.FFB19014041W dated 8 November 2019 issued by Bunga Tanjung POM, Estate: MDE-Koperasi Plasma Air Buluh; Vehicle BD8828CN; Transporter: Kopaba; Product: FFB; DO No.MDE/PLAS/08850; Nett weight: 6.84 MT; stamped as Certified Product – IP, RSPO certificate No.RSPO 646338.</p> <p>Plasma Air Merah MMAS: Delivery FFB from Field No.MDE/006707 dated 11 November 2019; Koperasi Air Merah (KPSB-MMAS); Vehicle BD8164YL; Year of planting 2012; qty. 840 bunches; stamped as Certified Product – IP, RSPO certificate No.RSPO646338. FFB Receiving Slip Ticket No.FFB19014094W dated 11 November 2019 issued by Bunga Tanjung POM, Estate: KMD Plasma Air Merah (KPSB-MMAS); Vehicle BD8164YL; Transporter: CV Anak Dalam Maju Bersama; Product: FFB; DO No.MDE/06707; Nett weight: 7.65 MT; stamped as Certified Product – IP, RSPO certificate No.RSPO 646338.</p> <p>KMD Nelan Indah: Delivery FFB from Field No.BTE/29382 dated 19 October 2019; KMD Nelan Indah; Vehicle BD8433AP; Year of planting 2014; qty. 701 bunches; stamped as Sustainable Product – IP, RSPO certificate No.RSPO646338. FFB Receiving Slip Ticket No.FFB19012982W dated 19 October 2019 issued by Bunga Tanjung POM, Estate: KMD Nelan Indah; Vehicle BD8433AP; Transporter: UD Yandi Bersaudara; Product: FFB; DO No.KMDNI/29382; Nett weight: 4.79 MT; stamped as Certified Product – IP, RSPO certificate No.RSPO 646338.</p> <p>KMD Air Bikuk: Delivery FFB from Field No.KMD/23 dated 31 October 2019; KMD Air Bikuk; Vehicle BD8997NK; Year of planting 2001; qty. 323 bunches; stamped as Certified Product – IP, RSPO certificate No.RSPO646338. FFB Receiving Slip Ticket No.FFB19013586W dated 31 October 2019 issued by Bunga Tanjung POM, Estate: KMD Air Bikuk; Vehicle BD8997NK; Transporter: UD Yandi Bersaudara; Product: FFB; DO No.KMDAB/23; Nett weight: 7.29 MT; stamped as Certified Product – IP, RSPO certificate No.RSPO 646338.</p>	
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		<p>KMD Bukit Harapan: Delivery FFB from Field No.ABE/005609 dated 31 October 2019; KMD Bukit Harapan; Vehicle BD550N; Year of planting 2014; qty. 861 bunches; stamped as Sustainable Product – IP, RSPO certificate No.RSPO646338. FFB Receiving Slip Ticket No.FFB19013613W dated 31 October 2019 issued by Bunga Tanjung POM, Estate: KMD Bukit Harapan; Vehicle BD8550N; Transporter: CV Cantika; Product: FFB; DO No.KMDBH/5609; Nett weight: 9.77 MT; stamped as Certified Product – IP, RSPO certificate No.RSPO 646338.</p>	
<p>5.5 Outsourcing Activities</p>			
<p>5.5.1</p>	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).</p>	<p>The transport for RSPO certified sustainable CPO delivery were carried out by several contractors. These contractors were appointed, contracted and instructed by PT. Agro Muko. The transport contractors are:</p> <ul style="list-style-type: none"> • PT. Usaha Jaya Express, address Jalan Olo Ladang No. 3 – Padang, contact name Mr. Freddy Johan/Ibu Siska, contact number 08535596****. • PT. Genta Perdana Diandra, address Gang Sehati No.54A RT.003 RW.002 Lubuk Begalung Nan XX – Padang, contact name Mr. Suhardiman, SE./Ibu Wiwik, contact number 08137427****. • PT. Bersama Sejahtera Mandiri, address Komplek Pertokoan Sakura – Jl. Raya By Pass KM.6 Padang, contact name Mr. H. Sengaja Budi Syukur, SH./Ibu Sri, contact number 08137283****. • PT. Mutia Mulia, address Jl. Raya By Pass KM.6 Simpang Arai Pinang - Padang, contact name Mr. Novi Andres/Mrs. Fitri, contact number 08137433****. <p>All contractors have signed Statement Letter dated 22 November 2018, that they all ready to comply with RSPO Supply Chain Standard and ready to be audited by CB if it deemed necessary. The Statement letter completed with compliance checklist against RSPO Supply Chain Standard.</p>	<p>Comply</p>

5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a) The site has legal ownership of all input material to be included in outsourced processes;</p>	<p>During transport, legal ownership of CSPO and CSPK are still under PT Agro Muko. This evident by sales contract that between PT. Agro Muko and the buyer.</p>	Comply																
	<p>b) The site 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 site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>The transport for RSPO certified sustainable CPO delivery were carried out by several contractors. These contractors were appointed, contracted and instructed by PT. Agro Muko. The transport contractors are:</p> <ul style="list-style-type: none"> • PT. Usaha Jaya Express, address Jalan Olo Ladang No. 3 – Padang, contact name Mr. Freddy Johan/Ibu Siska, contact number 08535596****. • PT. Genta Perdana Diandra, address Gang Sehati No.54A RT.003 RW.002 Lubuk Begalung Nan XX – Padang, contact name Mr. Suhardiman, SE./Ibu Wiwik, contact number 08137427****. • PT. Bersama Sejahtera Mandiri, address Komplek Pertokoan Sakura – Jl. Raya By Pass KM.6 Padang, contact name Mr. H. Sengaja Budi Syukur, SH./Ibu Sri, contact number 08137283****. • PT. Mutia Mulia, address Jl. Raya By Pass KM.6 Simpang Arai Pinang - Padang, contact name Mr. Novi Andres/Mrs. Fitri, contact number 08137433****. <p>All contractors have signed Statement Letter dated 22 November 2018, that they all ready to comply with RSPO Supply Chain Standard and ready to be audited by CB if it deemed necessary. The Statement letter completed with compliance checklist against RSPO Supply Chain Standard.</p>																	
	<p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>CPO Transporter of PT. Agro Muko:</p> <table border="1" data-bbox="674 1075 1576 1367"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Telephone</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>PT. Usaha Jaya Express</td> <td>Ibu Siska</td> <td>085355967779</td> <td>Jl. Olo Ladang No.3 Padang</td> </tr> <tr> <td>PT. Genta Perdana Diandra</td> <td>Ibu Wiwik</td> <td>081374277233</td> <td>Jl. Raya Lubuk Begalung, Gang Sehati 54A, Lubuk Begalung, Padang, Sumatera Barat</td> </tr> <tr> <td>PT. Bersama</td> <td>Ibu Sri</td> <td>081372833944</td> <td>Kompleks Pertokoan</td> </tr> </tbody> </table>	Contractor	Contact Person	Telephone	Address	PT. Usaha Jaya Express	Ibu Siska	085355967779	Jl. Olo Ladang No.3 Padang	PT. Genta Perdana Diandra	Ibu Wiwik	081374277233	Jl. Raya Lubuk Begalung, Gang Sehati 54A, Lubuk Begalung, Padang, Sumatera Barat	PT. Bersama	Ibu Sri	081372833944	Kompleks Pertokoan	
Contractor	Contact Person	Telephone	Address																
PT. Usaha Jaya Express	Ibu Siska	085355967779	Jl. Olo Ladang No.3 Padang																
PT. Genta Perdana Diandra	Ibu Wiwik	081374277233	Jl. Raya Lubuk Begalung, Gang Sehati 54A, Lubuk Begalung, Padang, Sumatera Barat																
PT. Bersama	Ibu Sri	081372833944	Kompleks Pertokoan																

		Sejahtera Mandiri			Sakura Jaya Jalan Raya Bypass KM.6, Padang	
		PT. Mutia Mulia	Ibu Fitri	085263174327	Jalan Raya Bypass, Arai Pinang KM.6, Batung Tabu, Lubuk Begalung, Kota Padang 25223	
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. 5.5.4 The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	The transport for RSPO certified sustainable CPO delivery were carried out by several contractors. These contractors were appointed, contracted and instructed by PT. Agro Muko. The transport contractors are:				Comply
		<ul style="list-style-type: none"> • PT. Usaha Jaya Express, address Jalan Olo Ladang No. 3 – Padang, contact name Mr. Freddy Johan/Ibu Siska, contact number 08535596****. • PT. Genta Perdana Diandra, address Gang Sehati No.54A RT.003 RW.002 Lubuk Begalung Nan XX – Padang, contact name Mr. Suhardiman, SE./Ibu Wiwik, contact number 08137427****. • PT. Bersama Sejahtera Mandiri, address Komplek Pertokoan Sakura – Jl. Raya By Pass KM.6 Padang, contact name Mr. H. Sengaja Budi Syukur, SH./Ibu Sri, contact number 08137283****. • PT. Mutia Mulia, address Jl. Raya By Pass KM.6 Simpang Arai Pinang - Padang, contact name Mr. Novi Andres/Mrs. Fitri, contact number 08137433****. • All contractors have signed Statement Letter dated 22 November 2018, that they all ready to comply with RSPO Supply Chain Standard and ready to be audited by CB if it deemed necessary. The Statement letter completed with compliance checklist against RSPO Supply Chain Standard. 				
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Audit team made annual visit to Agro Muko Tank Terminal (bulking storage facility), because there is always shipment through AMTT.				Comply
5.9 Record keeping						
5.9.1	The organisation shall maintain accurate, complete, up-to-date and accessible records	The organization has implemented RSPO Supply Chain Certification Standard based on procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains all aspects of supply chain and traceability scope in PT. Agro Muko: FFB harvesting, harvest				Comply

	and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for export; Shipping instruction and preparation; CPO and PK stock balancing post-shipping.																																													
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	The procedure of Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019 dated 18 March 2019 stipulates that "Storage and control of recordings related to production process in the mill are kept a shelf life of at least 5 (five) years or determined by OU. Records can be stored in the hardcopy and/or softcopy".	Comply																																												
5.9.3	The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	<p>PT. Agro Muko – Bunga Tanjung POM is able to provide estimate volume of CPO and PK in a year period as in "Budget Produksi Bulanan" consists estimate of FFB receiving from Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate, Malin Deman Estate, KMDs, Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA), Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS).</p> <p>12 months projection (Feb 2020 – Jan 2021):</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB received (MT)</th> <th>CPO production (MT)</th> <th>PK production (MT)</th> </tr> </thead> <tbody> <tr> <td>Feb 2020</td> <td>10109.51</td> <td>2325.21</td> <td>505.51</td> </tr> <tr> <td>Mar</td> <td>10388.21</td> <td>2389.27</td> <td>519.43</td> </tr> <tr> <td>Apr</td> <td>11044.25</td> <td>2540.20</td> <td>552.21</td> </tr> <tr> <td>May</td> <td>9063.99</td> <td>2084.73</td> <td>453.21</td> </tr> <tr> <td>Jun</td> <td>12123.13</td> <td>2788.34</td> <td>606.16</td> </tr> <tr> <td>Jul</td> <td>13761.47</td> <td>3165.14</td> <td>688.05</td> </tr> <tr> <td>Aug</td> <td>13124.29</td> <td>3018.58</td> <td>656.22</td> </tr> <tr> <td>Sept</td> <td>12965.41</td> <td>2982.02</td> <td>648.25</td> </tr> <tr> <td>Oct</td> <td>12795.30</td> <td>2942.92</td> <td>639.78</td> </tr> <tr> <td>Nov</td> <td>12048.43</td> <td>2771.14</td> <td>602.40</td> </tr> </tbody> </table>	Month	FFB received (MT)	CPO production (MT)	PK production (MT)	Feb 2020	10109.51	2325.21	505.51	Mar	10388.21	2389.27	519.43	Apr	11044.25	2540.20	552.21	May	9063.99	2084.73	453.21	Jun	12123.13	2788.34	606.16	Jul	13761.47	3165.14	688.05	Aug	13124.29	3018.58	656.22	Sept	12965.41	2982.02	648.25	Oct	12795.30	2942.92	639.78	Nov	12048.43	2771.14	602.40	Comply
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Dec	11634.36	2675.83	581.66												
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D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	The organization has implemented SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains in all aspects of supply chain and traceability scope in PT. Agro Muko, starting from FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for export, Shipping instruction and preparation, CPO and PK stock balancing post-shipping.	Comply												
E.5.1	<p>a) The site 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 palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it</p>	Not applicable.	N/A Not Applicable												

	is in stock.)		
5.10 Conversion Factors			
5.10.1	Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org).	Conversion rate is applied to provide reliable estimation of CPO and PK produced. For year 2018 and 2019, the budget for conversion from FFB into CPO is 23.00%, whilst from FFB to PK is 5.10%. For actual 2019 (data year todate 12 November 2019), actual conversion ratios from FFB into CPO is 22.74%, whilst from FFB to PK is 5.12%.	Comply
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The actual conversion rates in form of Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) is monitored on daily basis through sounding result and documented in Daily Production Report.	Comply
Processing D.6	The site 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 product including during transport and storage to strive for 100% separation.	PT. Agro Muko - Mukomuko POM did not receive any non-certified FFB. Therefore, no non-certified FFB being entered the process, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified oil. Silo for PK used to store certified product. Agro Muko Tank Terminal (AMTT) has three dedicated tank to received CPO from Mukomuko and Bunga Tanjung POM. Currently Tank uses for RSPO certified CPO are Tank No.3, No.7 and No.8 (capacity 3,000 MT each). To prevent contamination with other scheme CPO, AMTT has a designated piping system to pump the CPO from Agro Muko to the tanks. Receiving station using dedicated pipe number 3, 4 and 5 for CSPO IP, whilst pipe number 1 and 2 are for other source CPO. Based on field observation and document review (pipe line design and blowing up checklist) that the site was able to reach 100% segregated material through ensuring that non-certified material will always be segregated from unloading material (from Mukomuko POM) up to the dispatching products (to vessel/tanker).	Comply
5.6 Sales and goods out			

<p>5.6.1</p>	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer;</p> <ul style="list-style-type: none"> • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. • 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, 	<p>The SOP SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 regulated that several information required by the standard have to be available in the sales and goods out document. Sales and goods out documents seen are as follows:</p> <ul style="list-style-type: none"> • Contract No.2019/LTD-CPO/AM-BT/05 dated 13 September 2019. Seller PT. Agro Muko, Gedung Forum Nine Lt.10, Jl Imam Bonjol No.9, 20112 – Medan, Indonesia; Buyer: PT. Wira Inno Mas; Address: Spring Tower 03-34, Jl. KL Yos Sudarso Tanjung Mulia, Medan 20241; Product CPO; volume: 3,000 MT; module RSPO SG; handover location AMTT Teluk Bayur, Padang. • Marketing PT. Agro Muko made 26 separate Delivery Orders, to cater the contract; with 292 tanker deliveries. Shipping Instruction No.2019/BT-CPO/DO/91 from PT. Agro Muko to Agro Muko Tank Terminal dated 27 September 2019 described commodity: Indonesian Crude Sustainable Palm Oil SG; quantity: 3,000 MT; Seller PT. Agro Muko, Gedung Forum Nine Lt.10, Jl Imam Bonjol No.9, 20112 – Medan, Indonesia; Buyer: PT. Wira Inno Mas; Address: Spring Tower 03-34, Jl. KL Yos Sudarso Tanjung Mulia, Medan 20241. • Delivery Order No.2019/BT-CPO/DO/93 dated 2 October 2019, from marketing to Bunga Tanjung POM to deliver product CPO; quantity 250 MT (as part of 3,000 MT party) to Agro Muko Tank Terminal. In order to complete the D/O, Bunga Tanjung POM made 12 tanker deliveries. Sampled: Despatch slip No.CPO19001111W, dated 2 October 2019; source Bunga Tanjung POM; receiver Agro Muko Tank Terminal; product CPO; RSPO certificate No.RSPO646338; module IP; volume 22.49 MT; vehicle BA8253BU; seal No.72687-72688-72689. • “Berita Acara Penyerahan CPO” CPO tank transfer handover minutes; dated 5 October 2019 based on Contract No.2019/LTC-CPO/AM-BT/05. Whereby PT. Agro Muko assigned Agro Muko Tank Terminal to transfer: product CPO; volume: 3,000 MT; module RSPO SG; seller: PT. Agro Muko Bunga Tanjung; buyer PT. Wira Inno Mas; from tank No.6 (PT. Agro Muko) to tank No.3 (PT. Wira Inno Mas); volume recorded shore tank 2,999.957 MT; signed by both parties. • PalmTrace Shipping Announcement: TR-02415da0-6b79; date 8 October 2019; seller PT. Agro Muko-Bunga Tanjung POM; member ID RSPO_PO1000001279; buyer PT. Wira Inno Mas; member ID RSPO_PO1000006779; product CSPO; program Segregation; volume 2,999.96 MT; last update 11 October 2019. <p>The information completely available in the documents:</p> <ul style="list-style-type: none"> • The name and address of the buyer: PT. Wira Inno Mas; Address: Spring Tower 03-34, Jl. KL Yos Sudarso Tanjung Mulia, Medan 20241; 	<p>Comply</p>
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	<p>delivery notes, shipping documents and specification documentation).</p> <ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. 	<ul style="list-style-type: none"> The name and address of the seller: PT. Agro Muko, Gedung Forum Nine Lt.10, Jl Imam Bonjol No.9, 20112 – Medan, Indonesia; The loading or shipment/ delivery date: 5 October 2019 from AMTT to PT. Wira Inno Mas; The date on which the documents were issued: 5 October 2019 from AMTT to PT. Wira Inno Mas; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Oil – Sustainable Product IP on Dispatch Slip, Crude Palm Oil RSPO SG on B/L; The quantity of the products delivered; 2,999.96 MT on - "Berita Acara Penyerahan CPO" CPO tank transfer handover minutes ; Any related transport documentation: Contract No.2019/LTC-CPO/AM-BT/05; Supply chain certificate number of the seller; RSPO Certificate No. RSPO 646338 on Despatch Slip; A unique identification number: No.2019/BT-CPO/DO/91 on tank transfer note. <p>Informations are complete and presented in several document, e.g. Despatch Slip, Receiving Slip, Shipping Instruction, Contract and "Berita Acara Penyerahan CPO" CPO tank transfer handover minutes.</p> <p>The site has made Shipping Announcement in the RSPO IT platform per group of shipment based on contract, e.g.: TR-02415da0-6b79; date 8 October 2019; seller PT. Agro Muko-Bunga Tanjung POM; member ID RSPO_PO1000001279; buyer PT. Wira Inno Mas; member ID RSPO_PO1000006779; product CSPO; program Segregation; volume 2,999.96 MT; last update 11 October 2019 – for contract No.2019/LTD-CPO/AM</p>	
5.7 Registration of Transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> Are mills, traders, crushers and refineries; and Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO 	<p>PT. Agro Muko – Bunga Tanjung POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000001279.</p>	Comply

	IT platform and confirm upon receipt where applicable.		
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <p>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures.</p> <p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p>	<p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT. Agro Muko – Bunga Tanjung POM has made Shipping Announcement for certified CSPO and CSPK sold. For example:</p> <ul style="list-style-type: none"> • TR-02415da0-6b79; date 8 October 2019; seller PT. Agro Muko-Bunga Tanjung POM (ID RSPO_PO1000001279); buyer PT. Wira Inno Mas (ID RSPO_PO1000006779); product CSPO; program Segregation (SG); volume 2,999.96 MT; for contract No.2019/LTD-CPO/AM-BT/05 dated 13 September 2019. Buyer confirmed on 11 October 2019. • Shipping Announcement, with transaction ID No. TR-df6c7fe4-a017 for 300 MT CSPK IP; from PT. Agro Muko – Bunga Tanjung POM (RSPO_PO1000001279) as Seller to buyer PT. Wira Inno Mas (ID RSPO_PO1000006779) <p>At this annual surveillance audit (ASA4), PT Agro Muko – Bunga Tanjung POM has not sold any CSPO or CSPK to supply chain actor beyond the refinery. Not Applicable.</p> <p>Remove PalmTrace: For sold conventional/local; PT. Agro Muko – Bunga Tanjung POM is only certified under RSPO scheme, there is no other certification</p> <p>PT. Agro Muko – Bunga Tanjung POM is a palm oil mill, which does not need to confirm.</p>	Comply

	<p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</p>		
5.11 Claims			
5.11.1	<p>The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT. Agro Muko – Bunga Tanjung POM has not made any claim regarding the use of or support of RSPO certified oil palm products. The organization has good understanding on the RSPO Rules on Market Communications and Claims.</p>	Comply
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>PT. Agro Muko is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, the parent company of PT Agro Muko is highlighting its commitment to the principles of RSPO – therefore making an off product communication. The corporate communication of SIPEF Group can be seen in the corporate website: www.sipef.com.</p>	Comply
4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> Display its RSPO membership status Display the RSPO web address (www.rspo.org) 	<p>Corporate communication in SIPEF Group website:</p> <ol style="list-style-type: none"> Display its RSPO membership status: No, SIPEF did not display its RSPO membership status. Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website. State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote "We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO". 	Comply

	<p>c. State that the member supports the work of the RSPO</p> <p>d. State the member's history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>d. State the member's history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO.</p> <p>e. Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website.</p>	
4.3	<p>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 oil palm products.</p>	<p>No, SIPEF did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	Comply
4.4	<p>Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.</p>	<p>No, SIPEF did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF's own products.</p>	Comply
4.5	<p>Members are not allowed to use the RSPO corporate logo as</p>	<p>No, SIPEF Group did not display the RSPO Corporate Logo in the website as well as in the correspondence letter.</p>	Comply

	shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.		
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT. Agro Muko stating RSPO SG in the sales document. The RSPO SG notation adhere to the requirements of RSPO SCCS. PT. Agro Muko – Mukomuko POM and Bunga Tanjung POM is certified against RSPO P&C and comply to the RSPO SCCS for CPO Mills – Module D: Identity Preserved. All of the palm oil mills managed to demonstrate integrity of supply chain against the identity preserved system. During sales of CSPO and CSPK, PT. Agro Muko made clear the product is Segregated. Because at the point of shipping, all identity preserved oil palm product have been mixed between Certificate Holder’s palm oil mills.	Comply
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	PT. Agro Muko stating RSPO SG in the sales document. The RSPO SG notation adhere to the requirements of RSPO SCCS. PT. Agro Muko – Mukomuko POM and Bunga Tanjung POM is certified against RSPO P&C and comply to the RSPO SCCS for CPO Mills – Module D: Identity Preserved. All of the palm oil mills managed to demonstrate integrity of supply chain against the identity preserved system. During sales of CSPO and CSPK, PT. Agro Muko made clear the product is Segregated. Because at the point of shipping, all identity preserved oil palm product have been mixed between Certificate Holder’s palm oil mills.	Comply
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by	PT. Agro Muko – Bunga Tanjung POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK. Not Applicable.	N/A

	<p>linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a</p>	<p>PT. Agro Muko – Bunga Tanjung POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached.</p> <p>Not applicable.</p>	N/A

	breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.		
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	PT. Agro Muko – Bunga Tanjung POM is an RSPO certificate holder with certificate number RSPO 646338 valid until 21 February 2021. The certificate holder sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used. Not applicable.	N/A
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	PT. Agro Muko – Bunga Tanjung POM is an RSPO certificate holder with certificate number RSPO 646338 valid until 21 February 2021. The certificate holder sold its oil palm product in bulk, no product label attached. No RSPO trademark and/or RSPO label claims are used. Not applicable.	N/A
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	PT. Agro Muko – Bunga Tanjung POM sold its oil palm product in bulk, no product pack are used. Not applicable.	N/A
6.4	Business to consumer communication shall not include	PT. Agro Muko – Bunga Tanjung POM communication has not stated information about the claimant's RSPO membership status.	Comply

	information about the claimant's RSPO membership status.		
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	PT. Agro Muko – Bunga Tanjung POM is certified RSPO P&C, selling CSPO and CSPK. PT. Agro Muko and the parent company - SIPEF Group did not make any communication about their supplier's RSPO membership status.	Comply
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	The site sold its oil palm product in bulk, up to this moment, PT. Agro Muko – Bunga Tanjung POM has not use RSPO trademark.	Comply
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Up to this moment, PT. Agro Muko – Bunga Tanjung POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products.	Comply
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with	PT. Agro Muko – Bunga Tanjung POM is not a retailer or food service company. Not applicable.	N/A

	<p>the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard is applicable for PT. Agro Muko – Bunga Tanjung Palm Oil Mill (POM). Bunga Tanjung POM physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK). Bunga Tanjung POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved. Therefore 100% of the CPO and PK produced are RSPO IP-certified.</p>	<p>Comply</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>PT. Agro Muko – Bunga Tanjung Palm Oil Mill (POM) does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved. Not applicable.</p>	<p>Comply</p>

	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard is applicable for PT. Agro Muko – Bunga Tanjung Palm Oil Mill (POM). Bunga Tanjung POM physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK). Bunga Tanjung POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved. Therefore 100% of the CPO and PK produced are RSPO IP-certified.</p>	<p>Comply</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06</p>	<p>PT. Agro Muko – Bunga Tanjung Palm Oil Mill (POM) physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK) and does not use RSPO trademark of the RSPO trademark tag in its product. Not applicable.</p>	<p>N/A</p>

	<p>inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</p>		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org 	<p>No, SIPEF did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF's own products.</p>	<p>N/A</p>

	<ul style="list-style-type: none"> • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
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>The company has policies related to Human Rights as outlined in Policy No. QMM-40-01-P02 (Human Right Policy) dated 27 March 2019 which stated the company recognizes that Human Rights are universal and apply to all, without any form of distinction. The company supports the implementation of the international of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at work, as they are transcribed into the laws and regulations of the Republic of Indonesia.</p> <p>Based on interviews with the Security contractor (SSI), worker union, KMD Committee and the surrounding community, stated that the company did not conduct intimidation practices to employees or the surrounding community by using security personnel (Security/SSI) or others.</p> <p>Based on document verification, it shows that Management has disseminate Human Rights policies through:</p> <ul style="list-style-type: none"> • Post the policy on the bulletin board in each estate/mill office. • Conducting direct dissemination to workers, especially to security contractors (SSI). <p>Company have disseminated the policy related to respecting human rights.</p> <ul style="list-style-type: none"> • Being disseminated to PT. Usaha Jaya Express on 1 November 2019; • Being disseminated to PT. Mutia Mulia on 31 October 2019; 	Comply

		<ul style="list-style-type: none"> • Being disseminated to PT. Genta Perdana Diandra on 31 October 2019; • Being disseminated to PT. Bersama Sejahtera Mandiri on 30 October 2019; 	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	<p>Based on interviews with the Security contractor (SSI), worker union, KMD Committee and the surrounding community, stated that the company did not conduct intimidation practices to employees or the surrounding community by using security personnel (Security/SSI) or others.</p> <p>Based on document verification, it shows that Management has disseminate Human Rights policies through:</p> <ul style="list-style-type: none"> • Post the policy on the bulletin board in each estate/mill office. • Conducting direct dissemination to workers, especially to security contractors (SSI). <p>Company have disseminated the policy related to respecting human rights.</p> <ul style="list-style-type: none"> • Being disseminated to PT. Usaha Jaya Express on 1 November 2019; • Being disseminated to PT. Mutia Mulia on 31 October 2019; • Being disseminated to PT. Genta Perdana Diandra on 31 October 2019; 	Comply
Criteria 4.2			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	<p>The company already has a mechanism for resolving disputes consisting of:</p> <ul style="list-style-type: none"> • Land dispute refers to the mechanism of land dispute resolution as stipulated in "Land and Planting Compensation inside Location Permit of the Company" No. LCA-01-01/01-02-2018/Rev.0, dated 18 February 2018, it shows that the company has provided effective resolution of land dispute resolution as follows: <ul style="list-style-type: none"> - The company disseminates company location permits/HGU to the public. - If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership. - Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out. - Field surveys and land measurements involve companies, claimants and government representatives. - Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties. - Final verification based on measurement results and maps to ensure that the land does not overlap 	Comply

		<p>with the other ownership/rights/claims.</p> <ul style="list-style-type: none"> - If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation. - If a compensation price agreed, the company will pay the compensation to the land owner. • Resolution of Internal Complaint refers to the Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019. • Resolving external complaints refers to the External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019. • Wistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019. <p>All SOPs and Company Policies are available in two languages, English and Indonesian, which can be understood by the parties.</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>All SOPs and Company Policies are available in two languages, English and Indonesian, which can be understood by the parties.</p> <p>Company have disseminated the policy related to quality; human rights; equal work opportunity policy; occupational health and safety policy; environmental policy; anti-corruption policy; supplier integrity policy; child worker policy; forced labour policy and trafficked labor policy; sexual harassment policy; grievance handling policy; freedom of association policy; free of smoking policy; free of drug and alcohol policy; whistleblowing policy; IT security policy; use of IT hardware and computer use policy; code of ethical conduct policy; training policy; IT server room policy; general access control procedures – method by reading them.</p> <ul style="list-style-type: none"> • Being disseminated to PT. Usaha Jaya Express on 1 November 2019; • Being disseminated to PT. Mutia Mulia on 31 October 2019; • Being disseminated to PT. Genta Perdana Diandra on 31 October 2019; • Being disseminated to PT. Bersama Sejahtera Mandiri on 30 October 2019; 	Comply
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	<p>The company already has a mechanism for resolving disputes consisting of:</p> <ul style="list-style-type: none"> • Land dispute refers to the mechanism of land dispute resolution as stipulated in "Land and Planting Compensation inside Location Permit of the Company" No. LCA-01-01/01-02-2018/Rev.0, dated 18 February 2018, it shows that the company has provided effective resolution of land dispute resolution as follows: <ul style="list-style-type: none"> - The company disseminates company location permits/HGU to the public. - If there is a claim from the community, the company will accept the claim if accompanied by proof of 	Comply

		<p>land ownership.</p> <ul style="list-style-type: none"> - Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out. - Field surveys and land measurements involve companies, claimants and government representatives. - Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties. - Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims. - If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation. - If a compensation price agreed, the company will pay the compensation to the land owner. <ul style="list-style-type: none"> • Resolution of Internal Complaint refers to the Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019. • Resolving external complaints refers to the External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019. • Wistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019. <p>Based on document verification, it shows that the Management has disseminate the mechanism of land dispute resolution, Internal Grievance, External Grievance and Whistleblowing Policy mechanisms through:</p> <ul style="list-style-type: none"> • Post the policy on the bulletin board in each estate/mill office. • Conducting direct dissemination to workers, especially to security contractors (SSI), 	
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>At the moment the company does not made any compensation process to the surrounding community. All of the land used by Bunga Tanjung POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results, for example;</p> <ol style="list-style-type: none"> 1. GRTT document (Compensation for Growing Crops) that was carried out in 2013 has been implemented to Mr. Amin S. who owns an area of 1.14 Ha and Mr. Zakaria who has a land area of 1.36 Ha, both of whom are residents of Air Merah Village. The Document includes a Certificate of Land Ownership that is known by the Village Head and Sub-District Head; a Land Compensation Statement made by both parties and 	Comply

		<p>witnessed by each parties and known by the Head of the Village and Sub-District Head; Letter of release made by both parties, known by the Head of Air Merah Village and Sub-District Head Malin Deman; Map of measurement results with a scale of 1:2500 known by the Head of Air Merah Village. The process of compensation negotiation is outlined in the Land Acquisition Compensation Certificate including the agreed compensation value. Payment to the recipient is carried out through "Bank Bengkulu", Ipuh Sub-Branch on 15 July 2013 with No. A/C; 501-01.07.00030-6 worth Rp. 37,620,000, - for Mr. Amin S. and worth Rp. 44,880,000 for Mr. Zakaria. The document also comes with photos of the compensation handover process.</p> <p>2. Document of land compensation process that carried out in 2016 was documented in GRIT Document (Compensation for Growing Crops) No.30, carried out to Mr. Ali Mikir with an area of 2.51 Ha, villagers of Talang Baru village. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Release on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results with a scale of 1: 1,500 known by the Village Head of Talang Baru, 27 January 2016. The Negotiation Process of compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payments to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016, valued at Rp.107,930,000 for Mr. Ali Mikir. The document also comes with photos of the compensation handover.</p> <p>3. Document of the GRIT (Compensation for Growing Crops) No.15 to Mr. Edi Mansur, a resident of Talang Baru village, with an area of 0.65 Ha. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Release on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results together with a scale of 1: 1,500 known by the Village Head of Talang Baru, 26 January 2016. The Negotiation Process for compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payment to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016 worth Rp.27,950,000 for Mr. Edi Mansur. The document also comes with photos of the compensation handover.</p> <p>Based on interviews with local community leaders, they stated that they had received growth compensation payments carried out by management before carrying out oil palm development.</p>	
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Criteria 4.3

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

<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p>	<p>There is a program to improve the quality of life and beneficial environment, both for Plantation Companies or local and general communities as stipulated in the Community Development and Corporate Social Responsibility program of each Estate, for example "Community Development and Corporate Social Responsibility Program" Muko-Muko Estate 2019 consists of 9 types of activities, namely:</p> <ol style="list-style-type: none"> 1. Education 2. Health 3. Infrastructure; Repair of public facility buildings, repair of village trenches, construction of public toilets in schools, renovation of worship facilities 4. Agriculture 5. Micro and Small Enterprises 6. Sports; Maintenance of sports facilities, provision of facilities by the surrounding village sports facilities 7. Art 8. Religious; Religious assistance, breaking the fast and Ramadan gifts 9. Socio-economic <p>The realization of social activities up to April 2019 is as follows;</p> <p>Air Buluh Estate: Actual of CSR & Donation 2019, there is totally 56 activities of realisation CSR since January to October 2019. The significant contributions to the surrounding communities is supplying clean water during dry season every month since January to September 2019.</p> <p>Malin Deman Estate: Actual of CSR Tahun 2019, there is 16 activities of realisation CSR since Jan to Nov 2019. In example: 20 Feb 2019, assisting material for construction of mosque at Desa Air Merah.</p> <p>Bunga Tanjung Estate: Actual of CSR & Donation 2019, there is totally 38 activities of realisation CSR since January to October 2019. The significant contributions to the surrounding communities is road maintenance at village road on 19 September 2019.</p>	<p>Comply</p>
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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.

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<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>FPIC process already stated within Procedure of New Development Area (ESD-02-01/11-03-2019/Rev.1). Based on information collected during stakeholder consultation with statutory body and local communities, there is no land compensation made it since 2018. While, unit of certification within scope of Bunga Tanjung POM are still have and valid for documents that showing legal ownership for the Own Estates.</p> <p><u>HGU Holder:</u> Air Buluh Estate: Certificate No. 21, based on SK BPN No. 7/HGU/990, dated 3 May 1990. Validity period: 31 December 2020. Hectarage: 2,500 Ha.</p> <p>Air Bikuk Estate: Certificate No. 45, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 1,410 Ha.</p> <p>Bunga Tanjung Estate: Certificate No. 47, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 2,903 Ha.</p> <p>For KMD's, Progress of land ownership certificate submission for smallholders land (KMD's) is according to decree of Kementerian Agraria dan Tata Ruang Nomor: 455/100-17.16/X/2019, dated 29 October 2019. This letter concern to submission of smallholders certificate upon renewal Land Title or "HGU" Nomor 00014 (previous HGU Number 00002).</p> <p>Scope of submission land owner certificate for smallholders are KMD Air Buluh (14.77 Ha); KMD Nelan Indah (10.04 Ha); KMD Bukit Harapan (9.49 Ha); KMD Air Berau (10.19 Ha); KMD Tanjung Harapan (8.68 Ha); KMD Mundam Marap (1.04 Ha).</p> <p>FPIC process is already implemented prior to development of the plantation. During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p>	<p>Comply</p>
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<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: 4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera has documented all land compensation process since the beginning. The process includes evidence of consultation, statement of transfer of rights, evidence of compensation to demonstrate free, prior and informed consent. Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.</p> <p>FPIC process is already implemented prior to development of the plantation. During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p>	<p>Comply</p>
	<p>4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken</p>	<p>FPIC process is already implemented prior to development of the plantation. During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</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</p>	<p>FPIC process is already implemented prior to development of the plantation. During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p>	

	implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.		
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	<p>Certificate Holder maintaining the legal boundaries based on legal documentation. All the boundary pegs are mapped out in appropriate scale.</p> <p>Air Buluh Estate (ABE): "Peta Patok HGU Air Buluh Estate" Scale 1:44,458. During field observation at boundary pegs No. 053 (Block 00W02a, Div. 5); No. 081 (Block 02X03A, Div. 5); No. 515 (Block 98P01A, Div. 4).</p> <p>Malin Deman Estate (MDE): "Peta Point Patok BPN Malin Deman Estate" Scale 1:15,000.</p> <p>KMD Bukit Harapan: "Peta General Map" Scale 1:71,436. During field observation at KMD's area, legal boundary developed in form of "parit boundary".</p> <p>KMD Tanjung Harapan: "Peta General Map" Scale 1:80,000.</p> <p>KMD Mundam Marap: "Peta General Map" Scale 1:50,000.</p>	Comply
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Due to unit of certification is one of long establish company, therefore all relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements are available in Head Office Medan.	Comply
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.	<p>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is</p>	Comply

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4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	growth since the oil palm plantation are entering their village. FPIC process is already implemented prior to development of the plantation. During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.	Comply
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.	Unit of Certification has had legal document, as follow: Supply bases Bunga Tanjung POM consist of Own Estates, Smallholders (KMD's) and Smallholders Cooperative. During Surveillance-1.4 in 2019, sample of KMD's located Air Buluh Estate (ABE) are KMD Tanjung Harapan, KMD Bukit Harapan, KMD Mundam Marap. <u>HGU Holder:</u> Air Buluh Estate: Certificate No. 21, based on SK BPN No. 7/HGU/990, dated 3 May 1990. Validity period: 31 December 2020. Hectarage: 2,500 Ha. Air Bikuk Estate: Certificate No. 45, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 1,410 Ha. Bunga Tanjung Estate: Certificate No. 47, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 2,903 Ha. <u>KMD's:</u> Progress of land ownership certificate submission for smallholders land (KMD's) is according to decree of Kementerian Agraria dan Tata Ruang Nomor: 455/100-17.16/X/2019, dated 29 October 2019. This letter concern to submission of smallholders certificate upon renewal Land Title or "HGU" Nomor 00014 (previous HGU Number 00002).	

		Scope of submission land owner certificate for smallholders are KMD Air Buluh (14.77 Ha); KMD Nelan Indah (10.04 Ha); KMD Bukit Harapan (9.49 Ha); KMD Air Berau (10.19 Ha); KMD Tanjung Harapan (8.68 Ha); KMD Mundam Marap (1.04 Ha).	
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	<p>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p>Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.</p>	
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into	<p>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p>Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.</p>	Comply

	voluntarily and carried out prior to new operations.		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	FPIC process is already implemented prior to development of the plantation. During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village. Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.	Comply
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	FPIC process is already implemented prior to development of the plantation. During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village. Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.	Comply
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.	FPIC process is already implemented prior to development of the plantation. During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village. Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.	Comply

4.5.7	New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	There is no new plantings/new development/new land acquired for supply base of Bunga Tanjung POM since 15 November 2018.	N/A
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	There is no new plantings/new development/new land acquired for supply base of Bunga Tanjung POM since 15 November 2018.	N/A
<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	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	Based on document verification, PT. Agro Muko and PT. Mukomuko Agro Sejahtera have a mechanism for external complaint/grievance, as per "Prosedur Keluh Kesah dengan Pihak Eksternal" Doc. No. SOP/025/Dept, dated 27 March 2015. Internal complaint will be settled as per "Prosedur Keluh Kesah dengan Pihak Internal" No.SOP/025/Dept dated 27 March 2015. Mechanism to resolve land disputes as in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. The procedure shows company has prepared effective land dispute resolution mechanism: Company being transparent on permits, licenses including land title to the community; In case of claim from community, company will cater as long as valid land ownership evidence presented; Status verification – when valid land ownership evidence presented, continued with field visit/survey and measurement;	Comply
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or	There is no compensation made by the unit of certification for the last three years. procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. Including equal opportunities for men and women, already included within the unit of certification procedure.	Comply

	otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.		
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	There is no compensation made by the unit of certification for the last three years. procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. Including equal opportunities for men and women, already included within the unit of certification procedure.	Comply
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	There is no compensation made by the unit of certification for the last three years. procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. Including equal opportunities for men and women, already included within the unit of certification procedure.	Comply
Criteria 4.7			
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	<p>The company has a mechanism for identifying people entitled to compensation as stipulated in "Land and Planting Compensation Procedure inside of the Company" No.LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. Even though the disputed land is the legal property of the company contained in the HGU, but because it is still controlled by the community and has never been made to compensate, the company has taken steps to deliberate with those who claim and offer adequate compensation.</p> <p>The dispute resolution mechanism according to the procedure above is as follows:</p> <ul style="list-style-type: none"> • The company disseminates company location permits/HGU to the public. • If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership. • Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out. • Field surveys and land measurements involve companies, claimants and government representatives. 	Comply

		<ul style="list-style-type: none"> Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties. Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims. If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation. If a compensation price agreed, the company will pay the compensation to the land owner. 	
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>The company has a mechanism for calculating and distributing fair compensation as stipulated in "Land and Planting Compensation Procedure inside of the Company" No.LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. Even though the disputed land is the legal property of the company contained in the HGU, but because it is still controlled by the community and has never been made to compensate, the company has taken steps to deliberate with those who claim and offer adequate compensation.</p> <p>The dispute resolution mechanism according to the procedure above is as follows:</p> <ul style="list-style-type: none"> The company disseminates company location permits/HGU to the public. If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership. Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out. Field surveys and land measurements involve companies, claimants and government representatives. Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties. Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims. If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation. If a compensation price agreed, the company will pay the compensation to the land owner. 	Comply
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>Communities that have lost access and rights to land are given opportunities to benefit from plantation development by development of smallholder plantation, e.g. KMD and Koperasi Plasma. Partnership in development of KMD/Koperasi are stated in the Work Agreement Letter</p>	Comply

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.	Based on stakeholder consultation with relevant agencies and local communities, there is no land conflict or land disputes presence for the last three years within unit of certification. If there is any disputes or conflict, the unit of certification has had mechanism and procedure to resolve this. The procedure for external complaint/grievance, as per "Prosedur Keluh Kesah dengan Pihak Eksternal" Doc. No. SOP/025/Dept, dated 27 March 2015.	Comply
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	Based on stakeholder consultation with relevant agencies and local communities, there is no land conflict or land disputes presence for the last three years within unit of certification. If there is any disputes or conflict, the unit of certification has had mechanism and procedure to resolve this. The procedure for external complaint/grievance, as per "Prosedur Keluh Kesah dengan Pihak Eksternal" Doc. No. SOP/025/Dept, dated 27 March 2015. However, for the land conflict the unit of certification had Mechanism to resolve land disputes as in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. The procedure shows company has prepared effective land dispute resolution mechanism: Company being transparent on permits, licenses including land title to the community; In case of claim from community, company will cater as long as valid land ownership evidence presented; Status verification – when valid land ownership evidence presented, continued with field visit/survey and measurement.	Comply
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior	According information collected during stakeholder consultation with relevant statutory bodies and local community, there is no new acquisition within the scope of certification unit.	Comply

	to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)		
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)	Based on stakeholder consultation with relevant agencies and local communities, there is no land conflict or land disputes presence for the last three years within unit of certification. If there is any disputes or conflict, the unit of certification has had mechanism and procedure to resolve this. The procedure for external complaint/grievance, as per "Prosedur Keluh Kesah dengan Pihak Eksternal" Doc. No. SOP/025/Dept, dated 27 March 2015. However, for the land conflict the unit of certification had Mechanism to resolve land disputes as in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. The procedure shows company has prepared effective land dispute resolution mechanism: Company being transparent on permits, licenses including land title to the community; In case of claim from community, company will cater as long as valid land ownership evidence presented; Status verification – when valid land ownership evidence presented, continued with field visit/survey and measurement.	Comply
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 paid for FFB are publicly available and accessible by smallholders.	FFB price has been made publicly available by the company, as evidence in "Harga Pembelian TBS dari KMD". For example dated 31 Oct 2019, for FFB price period 28 Oct 2019 to 3 Nov 2019, as follow: <ul style="list-style-type: none"> • Category A = Rp 1,443/kg (≥ 94% ripeness) • Category B = Rp 1,428/kg (86 – 93% ripeness) • Category C = Rp 1,413/kg (≤ 85% ripeness). "Harga Pembelian TBS dari KMD" dated 6 Nov 2019, for FFB price period 4 to 10 Nov 2019, as follow: <ul style="list-style-type: none"> • Category A = Rp 1,460/kg (≥ 94% ripeness) • Category B = Rp 1,445/kg (86 – 93% ripeness) • Category C = Rp 1,430/kg (≤ 85% ripeness). 	Comply

		<p>"Harga Pembelian TBS dari KMD" dated 13 Nov 2019, for FFB price period 11 to 17 Nov 2019, as follow:</p> <ul style="list-style-type: none"> • Category A = Rp 1,523/kg (≥ 94% ripeness) • Category B = Rp 1,508/kg (86 – 93% ripeness) • Category C = Rp 1,493/kg (≤ 85% ripeness). 	
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Evidence verified that all KMD under Bunga Tanjung Estate have signed the document "Harga Pembelian TBS dari KMD" dated 31 Oct 2019. KMDs under Air Bikuk Estate, KMD Air Bikuk, KMD Air Berau and KMD Pondok Sugh have signed the FFB price on 6 Nov 2019.	Comply
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	All FFB prices have been agreed by KMDs, as evidence in "Harga Pembelian TBS dari KMD" dated 31 Oct 2019, which has been signed by all KMD representatives. KMDs under Air Bikuk Estate, KMD Air Bikuk, KMD Air Berau and KMD Pondok Sugh have signed the FFB price on 6 Nov 2019.	Comply
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	<p>Based on interview with KMD committee, all parties are involved and understood the contract they get into, including finance, loans/credits, and repayments through FFB price reductions for upkeep, harvesting and transport and or other mechanisms applicable.</p> <p>Agreement document verified:</p> <ol style="list-style-type: none"> 1. "Perjanjian Kerjasama Panitia Desa Semundam dengan PT Agro Muko", dated 10 Sept 2000; 15 Ha. 2. "Perjanjian Kerjasama Panitia Desa Talang Baru dengan PT Agro Muko", dated 9 Jul 2000; 15 Ha. 3. "Naskah Perjanjian Kerjasama Pelaksanaan Pembangunan, Pengelolaan dan Pemanfaatan Kebun Masyarakat Desa Tanjung Harapan", dated 17 Nov 2009; 10 Ha. 4. "Naskah Perjanjian Kerjasama Pelaksanaan Pembangunan, Pengelolaan dan Pemanfaatan Kebun Masyarakat Desa Medan Jaya", dated 17 Nov 2009; 10 Ha. 5. "Naskah Perjanjian Kerjasama Pelaksanaan Pembangunan, Pengelolaan dan Pemanfaatan Kebun Masyarakat Desa Pulau Baru", dated 17 Nov 2009; 10 Ha. <p>The Agreement mentioned the company obligation to fund all cost related operation of KMDs. All cost issued by the company for development of KMD (36 month) must be paid by KMD including rate 5% per year. Payment will be deducted 15% from FFB sales each month. Routine cost after mature stage, e.g. harvesting, FFB transport, upkeep, fertilizing and other operational cost will be deducted each month by the company from FFB sales.</p>	Comply

<p>5.1.5</p>	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p>	<p>Based on interview with KMD committee and review of agreement document, the contract are fair, legal, and transparent and have agreed timeframe.</p> <p>AMTT: Perjanjian Pengangkutan No.05/Angkutan/CPO/AM/06 between PT. Agro Muko and CV. Usaha Jaya for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since 1 May 2006) – signed on 26 April 2006. Perjanjian Pengangkutan No.05/Angkutan/CPO/AM/12 between PT. Agro Muko and CV. Genta Perdana for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since March 2012) – signed on 5 March 2012. Addendum No.01/2014 - Perjanjian Pengangkutan No.06/Angkutan/CPO/AM/09 between PT. Agro Muko and PT. Bersama Sejahtera Mandiri (previously UD. Budi Syukur) for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since 1 December 2009) – signed on 30 April 2014. Addendum No.02/2012 - Perjanjian Pengangkutan No.06/Angkutan/CPO/AM/12 between PT. Agro Muko and PT. Mutia Mulia (previously CV.Mekar Mulia) for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended) – signed on 18 October 2012.</p>	<p>Comply</p>
<p>5.1.6</p>	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p>	<p>Based on interview with KMD committee and review of payment documents, agreed payments are made in a timely manner, and receipts specifying price, weight, deductions and amount paid are given.</p> <p>AMTT: Invoice PT. Genta Perdana Diandra No.077/GPD/CPO/MM/IX/2019 dated 28 September 2019 for delivery of CPO based on D/O No.2019/MM-CPO/DO/16 of 250,000kg; actual transported CPO 249,610 kg; rate Rp.249.610/kg; total invoice Rp.56,961,002. Payment order from PT. Agro Muko to Bank Mandiri, for Rp.56,961,002 based on invoice No.077/GPD/CPO/MM/IX/2019 to PT. Genta Perdana Diandra, dated 22 October 2019.</p>	<p>Comply</p>

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Based on interview with KMD committee and review of payment documents, agreed payments are made in a timely manner, and receipts specifying price, weight, deductions and amount paid are given.

Payment documents verified:

1. Invoice KMDPR No.36 Desa Pulau Baru, Doc.No.KM19090129 for Fiscal Year 2019, Month September.

Description	Quantity	Rate (Rp)	Amount (Rp)	Deduction (Rp)
FFB Sales	9,460	1,285	12,156,100	-
Deduction	15%	12,156,100	-	1,823,415
Mandor - Labour	2	340,111	-	340,111
Circle & path spray - material	3	207,112	-	207,112
			12,156,100	2,370,638

Nett paid: Rp 9,785,462.

2. Invoice KMD No.23 Desa Air Bikuk, Doc.No.09/KMD-ABK/IX/2019 for period September 2019.

Description	Quantity	Rate (Rp)	Amount (Rp)	Deduction (Rp)
FFB Sales				
- 19/09/2019 (Class C)	5,680	1,245	7,071,600	-
- 18/09/2019 (Class C)	5,880	1,245	7,320,600	-
- 05/09/2019 (Class C)	4,580	1,223	5,601,340	-
- 04/09/2019 (Class C)	5,830	1,223	7,130,090	-
Sub Total FFB sales	21,970		27,123,630	
PPH deduction			-	135,618
Deduction Loan 68/70			-	5,000,000
Afrekening Contractor Harvesting	- 21,970	121	-	2,658,370
Others – galvanise pipe for block number			-	218,418
			27,123,630	8,012,406

		Nett paid: Rp 19,111,224.	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	<p>Weighbridge are verified by government agency in annual basis. Latest certificate of verification were observed for weighbridge in Bunga Tanjung POM, issued by "Dinas Perindustrian dan Perdagangan Kota Bengkulu", as follows:</p> <ol style="list-style-type: none"> 1. Calibration Certificate No.087/DPP-UPTDML/XI/2018 dated 15 Nov 2018; for Avery Weight Tronix type E-1205 S/N 072650167; maximum capacity 40,000 kg. 2. Calibration Certificate No.086/DPP-UPTDML/XI/2018 dated 15 Nov 2018; for Avery Weight Tronix type E-1205 S/N 094050205; maximum capacity 50,000 kg. <p>Bunga Tanjung POM has done process for 2019 calibration. Based on letter from independent laboratory, next calibration will be performed on 20 Nov 2019.</p> <p>Pemerintah Kota Padang, Dinas Perdagangan, UPTD Metrologi Legal - Surat Keterangan Hasil Pengujian No.510.3/0806/UPTD/ML/SKHP/X/2019 untuk Timbangan Jembatan Elektronik, 1 unit, Merek Every Weigh Tronix, capacity 60,000 kg. Testing date 11 October 2019. Valid date 14 October 20019 – 11 October 2020.</p>	Comply
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	Based on review of agreement the company carried out the development of plantation in KMD. Based on interview with KMD committee, the company carried the monitoring of upkeep, manuring, harvesting and FFB transport by providing Mandor (Supervisor) during those works. It was evident "Buku Visit KMD" for all KMD under Bunga Tanjung POM. As evidence "Buku KMD Tanjung Harapan", noted that on 12 Aug 2019 Mandor has made visit, with resume: growth wood at boundary, recommended to slashing or polish it with Garlon. On 4 Oct 2019 noted that there are unpicked loose fruit at market place and circle, action: clean the market place and give awareness to harvester. As evidence "Buku KMD Bukit Harapan", noted that on 3 Sept 2019 Mandor has made visit, with resume: still found wood at harvesting area, recommended to conduct selective spraying.	Comply
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	It was available procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders. Complainants can submit their complaints via email at http://www.tolantiga.co.id or directly to the respective person. Person whom directly supervises the complainants should discuss with the complainants to solve the issue. Timeframe for resolving grievance is 30 days. It was evident grievance documentation under "Rekaman Keluh Kesah" e.g. KMD Mundam Marap, KMD Tanjung Harapan and KMD Bukit Harapan. As well as "Rekaman Keluh Kesah" of Koperasi Perkebunan Air	Comply

		Buluh Agromuko (KOPABA – Plasma Air Buluh) and Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB MMAS – Plasma Air Merah).	
Criteria 5.2			
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	It was available procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders. Complainants can submit their complaints via email at http://www.tolantiga.co.id or directly to the respective person. Person whom directly supervises the complainants should discuss with the complainants to solve the issue. Timeframe for resolving grievance is 30 days. It was evident grievance documentation under "Rekaman Keluh Kesah" e.g. KMD Mundam Marap, KMD Tanjung Harapan and KMD Bukit Harapan. As well as "Rekaman Keluh Kesah" of Koperasi Perkebunan Air Buluh Agromuko (KOPABA – Plasma Air Buluh) and Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB MMAS – Plasma Air Merah). Initiation of KMD and other Smallholder are come from the communities (bottom up). Interested parties including women are consulted during the initiation and development Smallholders. Female members were evident in Smallholder, e.g. Tetty Marni Wati (Semundam Village) and Christie Theresa (Semundam Village).	Comply
5.2.2	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).	The company has develop and implement livelihood improvement programmes of Smallholders in surrounding communities. PT Agro Muko and PT Mukomuko Agro Sejahtera are helping the development of Kebun Masyarakat Desa (KMD) and other Samllholders. Companies provides technical guidance, financial credit, fertilizer support and receiving the FFB production from certified Kebun Masyarakat Desa (KMD) and other Smallholders into Bunga Tanjung POM (full managed). Currently PT. Agro Muko has assisted in development of 669.32 Ha Kebun Masyarakat Desa (KMD) from 56 villages with 10-15 Ha per village.	Comply
PROCEDURAL NOTE:			
The RSPO is currently developing a separate standard for Independent Smallholders.			
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB	The company has develop and implement livelihood improvement programmes of Smallholders in surrounding communities. PT Agro Muko and PT Mukomuko Agro Sejahtera are helping the development of Kebun Masyarakat Desa (KMD) and other Samllholders. Companies provides technical guidance, financial credit, fertilizer support and receiving the FFB production from certified Kebun Masyarakat Desa (KMD) and other	Comply

	production.	Smallholders into Bunga Tanjung POM (full managed). Currently PT. Agro Muko has assisted in development of 669.32 Ha Kebun Masyarakat Desa (KMD) from 56 villages with 10-15 Ha per village.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	The company has trains Scheme Smallholders on pesticide handling, as evidence in "Hasil Pelatihan Spraying dan Kalibrasi Alat Semprot" dated 25 Oct 2019. The training was attended by: 1. 22 spraying workers of Air Buluh Estate; 2. 3 spraying workers of KMD; 3. 11 spraying workers of Malin Deman Estate; 4. 5 spraying workers of Plasma Air Merah; 5. 4 spraying workers of Plasma Air Buluh. Training module, evaluation result and attendance list were available.	Comply
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	The company regularly review and reported the progress of plantation including Smallholders to the relevant stakeholder. PT Agro Muko can demonstrated "Laporan Kegiatan Perkebunan Besar Swasta" for period July and August 2019. The report has been distributed to "Dinas Tanaman Pangan, Hortikultura dan Perkebunan Provinsi Bengkulu" on 20 Sep 2019 based letter No.10/RMO-Disbun/IX/19. The report contain information of Smallholders area consist of Kebun Masyarakat Desa (KMD) 221.47 ha and Kemitraan Lainnya (other smallholders) 289.81 Ha. The report also described Production, Sales, Fertilizer applied, Agrochemical used and Labour used.	Comply
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 publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	The company has a policy to provide equal opportunities and training to obtain employment opportunities that are approved in the "Equal Employment Opportunity Policy" (QMM-40-01-P04) dated 27 March 2019. The Equal Employment Opportunity Policy is also regulated in the Human Resources Department Manual signed by Management on 8 April 2019. The document has regulates equal opportunity without discrimination (Non-Discrimination) based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age starting from the recruitment process, recruitment, transfer, promotion, training, renewal, employment and remuneration. Evidence of the policy implementation is announcing any vacancies at "Radar Muko Muko" (local newspaper) and the company's website (PT Tolan Tiga Indonesia) so that they can be accessed by everyone. E.g. Vacancies for the CW module at Sei Kiang Estate on 1 January 2019; Vacancies for Kindergarten/PAUD	Comply

		<p>Teachers at Sei Kiang Estate on 1 July 2019.</p> <p>Based on the results of public consultations with the Mukomuko District Manpower Office and the results of interviews with workers, it was agreed that there was no indication of discrimination during job recruitment of promotion. Every year, employees conduct performance appraisals as an assessment of promotions.</p> <p>Based on verification of labor documents as of October 2019 shows that there are various of labor origin, ethnic and religious beliefs, which can reflect that every citizen have the same opportunity to work.</p> <p>Based on verification of labor appointment documents, employee transfers, wages documents, employee appraisals in 2019 showed that there were no indications of discrimination practices.</p> <p>AMTT: Organization have disseminated the policy related to equal work opportunity policy. Being disseminated to PT. Usaha Jaya Express on 1 November 2019; Being disseminated to PT. Mutia Mulia on 31 October 2019; Being disseminated to PT. Genta Perdana Diandra on 31 October 2019; Being disseminated to PT. Bersama Sejahtera Mandiri on 30 October 2019;</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.</p>	<p>Based on verification of salary documents for period September and October 2019 at each Estate and Mukomuko POM, shows that workers at the same level and year of work, get same basic wage, which is in accordance with the provisions issued by the company and remuneration system which is updated annually adjusted to the Management Decree. Determination of Provincial Minimum Wages by the government and negotiations with SPAM (Workers Union). In 2019 there was an agreement between SPAM and PT Agromuko's Management regarding the Establishment of Wages in 2019 for Daily SKU Levels and Monthly SKUs as outlined in the Joint Agreement between PT Agromuko's Management and SPAM dated 22 March 2019, as results of meeting conducted on 19 – 22 March 2019 in Curup, Bengkulu.</p> <p>The agreed payroll structure is divided into 2 categories, which is daily and monthly SKU. For monthly employees, the payroll system is based on Grades (P, Q, R, S, T, U, EL) whose appraisals are conducted annually by each direct supervisor. The results of the employee appraisal are outlined in the Form "Penilaian Karyawan SKU" which describes the assessment parameters such as ability, responsibility, cooperation with others, hard working, able to receive input, trustworthy/honest, discipline, timeliness in carrying out work,</p>	Comply

		<p>administrative and loyalty. The form also describes direct supervisor's comments and proposals/promotions to a higher level.</p> <p>Bengkulu Provincial Government, has set the provincial minimum wage (UMP) in 2019 in accordance with the Decree of the Governor of Bengkulu No.G.480.DISNAKER in 2018 dated 31 October 2018, states that the minimum wage in Bengkulu Province is Rp. 2,040,407/month. Management of PT Agro Muko has set a Minimum Wage in 2019 of Rp. 2,040,407/month with Rp. 81,616/day and Rp. 11,659/Hour via letter from General Manager Office No.53/GMO-All OU/XII-18 dated 5 December 2018.</p> <p>Based on interviews with workers and verification of labor documents for the period of October 2019, it shows that there are no migrant workers in PT Agromuko or PT MMAS.</p>	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	<p>The company has a policy to provide equal opportunity and treatment for employment as stated in the "Equal Employment Opportunity Policy" (QMM-40-01-P04) dated 27 March 2019. The Equal Employment Opportunity Policy is also regulated in the "Human Resources Department Manual" signed by Management on 8 April 2019. The document has set equal opportunity without discrimination (Non-discrimination) based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age starting from the recruitment process, permanent employment, transfer, promotion, training, workforce assessment, and remuneration.</p> <p>Evidence of the implementation of this policy is to publicly announce every vacancy in the local newspaper "Radar Muko Muko" and the company's website (PT Tolan Tiga Indonesia) so that everyone can access it.</p> <p>Based on the results of public consultations with Mukomuko District Manpower Office and the results of interviews with workers, stated that there was no indication of discrimination in employment opportunities. Every year, employees are assessed for performance as part of their consideration for level promotion.</p> <p>Based on documents verification, shows that results of employee appraisal are documented in Form "Penilaian Karyawan SKU" which outlines assessment parameters such as ability, responsibility, cooperation with others, hard working, able to receive input, trustworthy/honest, discipline, timeliness in carrying out job, administration and Loyalty. The form also describes direct supervisor's comments and proposals for promotions to higher level.</p>	Comply
6.1.4	Pregnancy testing is not	The unit of certification has renewed its Protection of Reproductive Rights Policy (QMM-40-01-P11) dated 27	Comply

	<p>conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>March 2019.</p> <p>Based on interviews with female workers and members of Gender Committee, shows that the company has understood the implementation of reproductive rights protection policies for employees, for example the implementation of menstrual leave rights, maternity leave, special health checks for female workers who work as spraying and fertilizer workers, prohibition of violence/sexual harassment of female workers. Pregnancy checks are carried out in the First Aid Room by paramedic.</p> <p>The policy has been disseminated to all employees by posting the policies on the notice board (Estate Office) and verbal dissemination to employees,</p>	
<p>6.1.5</p>	<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>Based on document verification and interviews with management and Gender Committee, each Estate and Mill has formed a Gender Committee, for example:</p> <ol style="list-style-type: none"> 1. Organization Structure of Mukomuko Estate Gender Committee (Gender Committee Contact Group) which was ratified on 1 October 2019, chaired by the Estate Manager with 1 Secretary and 4 committee members. 2. Organization Structure of Talang Petai Gender Committee (Gender Committee Contact Group) which was ratified on 15 November 2019, chaired by the Estate Manager with 3 committee members. 	<p>Comply</p>
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope.</p>	<p>Based on verification of salary documents for period September and October 2019 at each Estate and Mukomuko POM, shows that workers at the same level and year of work, get same basic wage, which is in accordance with the provisions issued by the company and remuneration system which is updated annually adjusted to the Management Decree. Determination of Provincial Minimum Wages by the government and negotiations with SPAM (Workers Union). In 2019 there was an agreement between SPAM and PT Agromuko's Management regarding the Establishment of Wages in 2019 for Daily SKU Levels and Monthly SKUs as outlined in the Joint Agreement between PT Agromuko's Management and SPAM dated 22 March 2019, as results of meeting conducted on 19 – 22 March 2019 in Curup, Bengkulu.</p> <p>The agreed payroll structure is divided into 2 categories, which is daily and monthly SKU. For monthly employees, the payroll system is based on Grades (P, Q, R, S, T, U, EL) whose appraisals are conducted annually by each direct supervisor. The results of the employee appraisal are outlined in the Form "Penilaian Karyawan SKU" which describes the assessment parameters such as ability, responsibility, cooperation with others, hard working, able to receive input, trustworthy/honest, discipline, timeliness in carrying out work, administrative and loyalty. The form also describes direct supervisor's comments and proposals/promotions to</p>	<p>Comply</p>

		<p>a higher level.</p> <p>Bengkulu Provincial Government, has set the provincial minimum wage (UMP) in 2019 in accordance with the Decree of the Governor of Bengkulu No.G.480.DISNAKER in 2018 dated 31 October 2018, states that the minimum wage in Bengkulu Province is Rp. 2,040,407/month. Management of PT Agro Muko has set a Minimum Wage in 2019 of Rp. 2,040,407/month with Rp. 81,616/day and Rp. 11,659/Hour via letter from General Manager Office No.53/GMO-All OU/XII-18 dated 5 December 2018.</p> <p>Realization of Minimum Wage Payments is made for wages in March 2019 with increase accumulation in March 2019. Based on the verification of payslip of PT Agro Muko employees, shows that the company has implemented minimum wage in 2019</p> <ul style="list-style-type: none"> • 	
<p>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).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.</p>	<p>PT Agro Muko: The company has a Collective Work Agreement (PKB) which has been signed jointly by Management and Worker Union on 19 October 2018 and is recognized by Kepala Dinas Penanaman Modal, Pelayanan Perizinan Terpadu dan Tenaga Kerja (Manpower Office) of Mukomuko Regency. This PKB is effective from October 2018 to October 2020.</p> <p>The document regulates the recognition of worker union existence of Trade Unions, Provisions regarding working time, wage system, sick leave, absence, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods and the Termination of Collective Labor Agreements.</p> <p>Article IV (Wages) regulates:</p> <ul style="list-style-type: none"> • Wages in the form of money: Daily and Monthly Workers of PT Agro Muko's wages are negotiated between the company and worker union that refers to the applicable provisions, and the wage negotiation must be completed not later than April in the current year. 	Comply

		<ul style="list-style-type: none"> • Wages in the form of Natura: Worker gets 15 kg rice, unemployed wife/husband gets at most 9 kg, children gets 7.50 kg (maximum 3 children). <p>In 2019 there was an agreement between SPAM (Workers Union) with PT Agro Muko's Management regarding the Establishment of 2019 Wages for Daily and Monthly SKU as outlined in the Joint Agreement between PT Agro Muko's Management and SPAM on 22 March 2019, as results of meeting on 19-22 March 2019 in Curup, Bengkulu.</p> <p>PT Muko Muko Agro Sejahtera (MMAS): Previously, PT MMAS had a Company Regulation that was approved by Kepala Dinas Penanaman Modal, Pelayanan, Perizinan dan Tenaga Kerja Kabupaten Mukomuko on 8 December 2016 and valid until 7 December 2018. PT MMAS had sent an application for the Ratification of the Company Regulation (PP) through Manager Letter No.64/RMO-G/XI/19 dated 15 November 2019. PT MMAS Company Regulation has been approved by Kepala Dinas Penanaman Modal, Pelayanan, Perizinan dan Tenaga Kerja Kabupaten Mukomuko as on Decree No.01/2019 dated 18 November 2019 and valid until 15 November 2021. Based on the verification of Company Regulation (PP) document, there is no content change from the previous PP. The document regulates the provisions regarding working time, wage system, sick days, absent, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Article III (Wages) regulates:</p> <ul style="list-style-type: none"> • Wages in the form of money: Daily and Monthly Workers of PT MMAS wages are negotiated between the company and worker union that refers to the applicable provisions, and the wage negotiation must be completed not later than April in the current year. • Wages in the form of Natura: Worker gets 15 kg rice, unemployed wife/husband gets at most 9 kg, children gets 7.50 kg (maximum 3 children). <p>Organization have disseminated the policy related to quality; human rights; equal work opportunity policy; occupational health and safety policy; environmental policy; anti-corruption policy; supplier integrity policy; child worker policy; forced labour policy and trafficked labor policy; sexual harassment policy; grievance</p>	
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		<p>handling policy; freedom of association policy; free of smoking policy; free of drug and alcohol policy; whistleblowing policy; IT security policy; use of IT hardware and computer use policy; code of ethical conduct policy; training policy; IT server room policy; general access control procedures;</p> <p>Being disseminated to PT. Usaha Jaya Express on 1 November 2019; Being disseminated to PT. Mutia Mulia on 31 October 2019; Being disseminated to PT. Genta Perdana Diandra on 31 October 2019; Being disseminated to PT. Bersama Sejahtera Mandiri on 30 October 2019;</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p>	<p>Normative rules on industrial relations are regulated in Collective Work Agreements or Company Regulations, for example provisions regarding working hours, wage systems, sick leave, absence, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods.</p> <p>Based on document verification and interviews with workers, stated that each worker has a Work Agreement with companies made in Bahasa Indonesia as a language understood by all ethnicities in PT Agro Muko and PT MMAS. The Work Agreement Letter regulates position, validity period and expiration of work agreement, obligations of workers, placement/transfer, payroll, medical, annual leave, insurance, and termination of employment.</p>	Comply
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>Normative rules on industrial relations are regulated in Collective Work Agreements or Company Regulations, for example provisions regarding working hours, wage systems, sick leave, absence, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods.</p> <p>Based on interview with SPAM (worker union) and worker, stated that the company has realized normative obligation on industrial relation that regulated in Collective Work Agreements (PKB) and Company Regulation (PP).</p>	Comply

<p>6.2.4</p>	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>The unit of certification has provided facilities and infrastructure for employee welfare in form of staff housing (98 units), employee housing (1,320 units), mosques (26 units), Church (1 unit), community hall (15 units), Kindergarden (16 units), Elementary Schools (4 units), school buses, day care centers (13 units), polyclinics (11 units), warehouses (17 units), sports facilities such as football field, volley ball, badminton, golf, tennis court and tennis table.</p> <p>Facilities and infrastructure at Mukomuko Estate include:</p> <ul style="list-style-type: none"> • Employee Housing: 496 units • Mosque: 3 units • Kindergarden: 3 units • Child care center: 3 units • Sports facilities: volleyball, tennis, badminton, golf • Polyclinic: 1 unit • School Bus: 4 units • Water tank; 4 units <p>Based on interviews with workers, stated that PT Agromuko has a program for the maintenance of employee housing and other public facilities that implemented periodically. Based on documents verification, shows that Mukomuko Estate has had an Employee & Staff Housing Improvement Plan. In addition, the company also provides electricity and clean water that is provided free of charge to employees.</p> <p>AMTT: Organization's worker living on city, Padang in their own home.</p>	<p>Comply</p>
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>The unit of certification provided natura (rice allowance) with amount 15 Kg for worker, maximum 9 kg for unemployed suppose and 7.5 kg for children (maximum 3 children). Providing natura is beyond the basic wage, that is in accordance with statutory regulations.</p> <p>To assist employees in supply of basic needs, the unit of certification committed to form employee cooperatives. This indicated by the existence of an employee cooperative known as the " Koperasi Serba Usaha Karyawan Agromuko" which was established in 2006.</p> <p>The head office of the employee cooperative located Regional Manager Office (RMO) area, branch store have</p>	<p>Comply</p>

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		<p>been built in each estate. There is branch store of employee cooperatives in each estate to help employees meet their basic daily needs. The company helps provide cooperative offices and stores, electricity, clean water, legality costs and salary deduction for employees who gets cooperatives loan.</p> <p>AMTT: Organization's worker living on city, Padang with vast access for adequate, sufficient and affordable food.</p>	
6.2.6	<p>A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera has prepared the prevailing wage calculation. The company referred to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> - Reference family size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2018); - Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2018); - Food cost (with 2100 calory, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice; - Housing cost (provided by company); - Non Food Non Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company); - Mandatory deduction (from tax and BPJS levy); <p>Gross Living Wage at Rp.2,405,295; Prevailing wage at Rp.2,859,333; Gap at Rp.454,039 (positive);</p>	Comply
<p>PROCEDURAL NOTE: The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist.</p>			
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p>	<p>There is no casual worker works at the unit of certification. All workers have status of permanent workers (SKU-B or SKU-H) of temporary worker (PKWT). PKWT is only applicable for probation period. Gradually the status of PKWT has been upgraded to be Permanent Workers (SKU-H), as evidence:</p> <ol style="list-style-type: none"> 1. Appointment Letter of PKWT became SKU-H No.03/RMO-MME/IV/2019 dated 1 April 2019 for 14 harvester in Mukomuko Estate. 2. Appointment letter of PKWT became SKU-H No.20/RMO-MME/X/2019 dated 2 October 2019 for 7 	Comply

		<p>harvester in Mukomuko Estate.</p> <p>3. Appointment letter from SKU-H to SKU-B No.209/JWB-RMOBG/IX/2019 dated 16 November 2019 for 3 workers of Sungai Kiang Estate, Air Buluh Estate and CWAM (Central Workshop).</p> <p>4. Appointment letter of PKWT became SKU-H No.31/TRE-RMO/VI/2019 dated 20 June 2019 for 2 workers in Tanah Rekah Estate.</p> <p>For other types of work, PT Agromuko collaborates with local labor service providers to do seasonal work such as Replanting.</p>	
<p>Criteria 6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>The unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that "the company recognizes the role of lawful and independent workers and employees representative organizations in creating a constructive working environment". The existence of worker union has been recognized under "Serikat Pekerja Agromuko Mandiri (SPAM)" which has been registered to the Manpower Office of Mukomuko regency under registration No. D.3/560/16/PC-F.SPPP. SPSI/IV/2011, dated 18 February 2011.</p> <p>SPAM Group Committee for period 2017 - 2019 was according to "Surat Keputusan Pengurus Induk" No. KEP.01/SK/SPAM-AM/X/2017 dated 17 October 2017 concerning Ratification of the SPAM committee in parent level. The composition of the SPAM Board has been registered to the Dinas Penanaman Modal, Pelayanan Perizinan Terpadu dan Tenaga Kerja Kabupaten Mukomuko under registration No. D.10/560/61/PUK.SPAM-FSPMI/I/2018 dated 23 January 2018. The organizational structure of PT Agro Muko's SPAM (Group) period 2017 - 2019 was chaired by Mr. Nofirizal.</p> <p>Each unit then forms a Unit Level Coordinator, for example: Tanah Rekah Estate Workers Union is chaired by Mr. Zulkifli in accordance with SPAM's Committee Decree No. KEP.12/SK/SPAM-AM/X/2017 dated 31 October 2017, concerning Ratification of the Management Structure of Tanah Rekah Estate Worker Union.</p> <p>Organization have disseminated the policy related to quality; human rights; equal work opportunity policy; occupational health and safety policy; environmental policy; anti-corruption policy; supplier integrity policy; child worker policy; forced labour policy and trafficked labor policy; sexual harassment policy; grievance</p>	<p>Comply</p>

		<p>handling policy; freedom of association policy; free of smoking policy; free of drug and alcohol policy; whistleblowing policy; IT security policy; use of IT hardware and computer use policy; code of ethical conduct policy; training policy; IT server room policy; general access control procedures;</p> <p>Being disseminated to PT. Usaha Jaya Express on 1 November 2019;</p> <p>Being disseminated to PT. Mutia Mulia on 31 October 2019;</p> <p>Being disseminated to PT. Genta Perdana Diandra on 31 October 2019;</p> <p>Being disseminated to PT. Bersama Sejahtera Mandiri on 30 October 2019;</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.</p>	<p>The Workers Union (SPAM) regularly holds meetings with the company every month or at certain times if there are urgent issues to be discussed, for example a meeting on 19-22 March 2019 in Curup, Bengkulu, to discuss 2019 wages, which the results are set forth in Joint Agreement between PT Agro Muko's Management and SPAM on 22 March 2019.</p>	Comply
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p>	<p>The unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that "the company recognizes the role of lawful and independent workers and employees representative organizations in creating a constructive working environment".</p> <p>Based on interviews with the parent Worker Union and Estate coordinator, it was stated that the Management did not intervene in the formation/selection of the management of the Workers Union, although the office facilities were provided by company Management. The unit of certification also gives concessions to Workers Union management to hold events related to the Union, e.g. permit to hold management meetings.</p> <p>For PT MMAS which until now there has not been formed a Workers Union, the discussion related to manpower, a Bipartite Cooperation (LKS) has been formed and holds a meeting with management once a month.</p>	Comply
<p>Criteria 6.4: Children are not employed or exploited.</p>			
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</p>	<p>The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019, stated that "PT Agro Muko is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p>	Comply

	agreements.	<p>Based on verification of worker documents for period October 2019 in each Estate and Mill, there are no workers who are less than 18 years of age when hired as workers</p> <p>Organization have disseminated the policy related to quality; human rights; equal work opportunity policy; occupational health and safety policy; environmental policy; anti-corruption policy; supplier integrity policy; child worker policy; forced labour policy and trafficked labor policy; sexual harassment policy; grievance handling policy; freedom of association policy; free of smoking policy; free of drug and alcohol policy; whistleblowing policy; IT security policy; use of IT hardware and computer use policy; code of ethical conduct policy; training policy; IT server room policy; general access control procedures; Being disseminated to PT. Usaha Jaya Express on 1 November 2019; Being disseminated to PT. Mutia Mulia on 31 October 2019; Being disseminated to PT. Genta Perdana Diandra on 31 October 2019; Being disseminated to PT. Bersama Sejahtera Mandiri on 30 October 2019;</p>	
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	<p>As outlined in indicator 6.4.1, The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019, stated that "PT Agro Muko is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Based on verification of job vacancy announcement documents as well as job application requirements data, it shows that each applicant file must attach a copy of National Identity Card (KTP) to verify data of age and citizenship status.</p> <p>Organization demonstrates the profile of all workers (8) and the youngest worker Ilham Akbar DoB 11 December 1989 – started work on 1 January 2015 (26 years old).</p>	Comply
6.4.3	(C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.	<p>As outlined in indicator 6.4.1, The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019, stated that "PT Agro Muko is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Based on verification of worker documents for period October 2019 in each Estate and Mill, there are no workers who are less than 18 years of age when hired as workers.</p>	Comply

		Organization demonstrates the profile of all workers (8) and the youngest worker Ilham Akbar DoB 11 December 1989 – started work on 1 January 2015 (26 years old).	
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>Based on interviews with contractors, workers union officials, KMD committees and workers in field, showed that they have understood company policies to prohibit the use of child labor in all types of company operational activities.</p> <p>Based on document verification, shows that the unit of certification has disseminated the policy prohibiting the use of child labor through:</p> <ol style="list-style-type: none"> 1. Post the policy on the bulletin board in each estate/mill office 2. Conducting verbal dissemination to workers, especially types of work which are vulnerable to use "informal workers" such as in the harvesting. 3. Include a clause of prohibiting the use of child labor in each contract document with the contractor. <p>Organization have disseminated the policy related to quality; human rights; equal work opportunity policy; occupational health and safety policy; environmental policy; anti-corruption policy; supplier integrity policy; child worker policy; forced labour policy and trafficked labor policy; sexual harassment policy; grievance handling policy; freedom of association policy; free of smoking policy; free of drug and alcohol policy; whistleblowing policy; IT security policy; use of IT hardware and computer use policy; code of ethical conduct policy; training policy; IT server room policy; general access control procedures; Being disseminated to PT. Usaha Jaya Express on 1 November 2019; Being disseminated to PT. Mutia Mulia on 31 October 2019; Being disseminated to PT. Genta Perdana Diandra on 31 October 2019; Being disseminated to PT. Bersama Sejahtera Mandiri on 30 October 2019;</p>	Comply
Criteria 6.5:			
There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	The unit of certification has a policy on prevention of sexual harassment/ violence as outlined in policy No. QMM-40-01-P10, Rev 1 (Sexual Harassment Policy) dated 27 March 2019. Based on interview with female workers and Gender Committee, shows that they have understood the company's policies on prevention of sexual harassment. During 2019 there had never been complaints from employees related to sexual harassment/violence at work, however there were reports of affair between employees in Tanah Rekah Estate and has been processed using the Company Code of Ethics.	Comply

		<p>The policy has been disseminated to employees through posting the policies on the notice board (Estate/Mill Office) and conduct verbal dissemination to employees, for example:</p> <ol style="list-style-type: none"> Dissemination to Mukomuko Estate employees on 4 November 2019, attended by 84 workers. Dissemination to Mukomuko POM Lab employees on 16-17 September 2019, attended by 11 workers. Dissemination to Talang Petai Estate employees on 5 August 2019, attended by 29 workers. Dissemination to Tanah Rekah Estate employees on 9 September 2019, attended by 33 workers. Dissemination to Sei Kiang Estate employees on 24 September 2019, attended by 48 workers including contractors. <p>Organization have disseminated the policy related to sexual harassment policy; grievance handling policy; whistleblowing policy. Being disseminated to PT. Usaha Jaya Express on 1 November 2019; Being disseminated to PT. Mutia Mulia on 31 October 2019; Being disseminated to PT. Genta Perdana Diandra on 31 October 2019; Being disseminated to PT. Bersama Sejahtera Mandiri on 30 October 2019;</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p>	<p>The unit of certification has a policy on protection of reproductive rights as outlined in policy No. QMM-40-01-P11, Rev 1 (Protection of Reproductive Rights Policy) dated 27 March 2019. Based on interview with female workers and gender committee, show that they have understood the company's policy on protection of reproductive rights. The unit of certification have implemented protection of reproductive rights, for example:</p> <ol style="list-style-type: none"> Give 90 days of maternity leave. Give menstrual leave (H1) rights to female workers who are sick during menstruation for 2 days with the consideration from medical personnel. Conduct pregnancy test for to female workers who work at high-risk stations such as spraying and fertilizing. Transferring pregnant workers to other types of work that are not at risk for pregnancy. Give special time for female workers who are breastfeeding at 10:00 to 11:00 and at 15:00 to 15:30. <p>All policies on the protection of reproductive rights are also regulated in Collective Labor Agreements or Company Regulations.</p> <p>The policy has been disseminated to employees through posting the policies on the notice board (Estate/Mill Office) and conduct verbal dissemination to employees, for example:</p> <ol style="list-style-type: none"> Dissemination to Mukomuko Estate employees on 4 November 2019, attended by 84 workers. 	Comply

		<p>b. Dissemination to Mukomuko POM Lab employees on 16-17 September 2019, attended by 11 workers.</p> <p>c. Dissemination to Talang Petai Estate employees on 5 August 2019, attended by 29 workers.</p> <p>d. Dissemination to Tanah Rekah Estate employees on 9 September 2019, attended by 33 workers.</p> <p>e. Dissemination to Sei Kiang Estate employees on 24 September 2019, attended by 48 workers including contractors.</p> <p>Organization have disseminated the policy related to sexual harassment policy; grievance handling policy; whistleblowing policy.</p> <p>Being disseminated to PT. Usaha Jaya Express on 1 November 2019;</p> <p>Being disseminated to PT. Mutia Mulia on 31 October 2019;</p> <p>Being disseminated to PT. Genta Perdana Diandra on 31 October 2019;</p> <p>Being disseminated to PT. Bersama Sejahtera Mandiri on 30 October 2019;</p>	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	The unit of certification has implemented policy to give special time to female workers who are breastfeeding for breastfeeding their children at 10:00 - 11:00 and 15:00 - 15:30 as stipulated in the Collective Labor Agreement or Company Regulations. However the company can reassess the needs of female worker who just given birth by involving Gender Committee Contact Group.	Comply
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	<p>Specific Grievance mechanisms for complaints related to sexual harassment/ violence are set out in the Sexual Harrassment/Violence Prevention Policy (QMM-40-01-P10, Rev 1) dated 27 March 2019. The complaint mechanism refers to the Grievance Policy (QMM-40-01-P12) dated 1 March 2014.</p> <p>Based interview with female workers and Gender Committee, they have understood the company's policy related Prevention of Sexual Harrassment/ Violence.</p> <p>The policy has been disseminated to employees through posting the policies on the notice board (Estate/Mill Office) and conduct verbal dissemination to employees, for example:</p> <p>a. Dissemination to Mukomuko Estate employees on 4 November 2019, attended by 84 workers.</p> <p>b. Dissemination to Mukomuko POM Lab employees on 16-17 September 2019, attended by 11 workers.</p> <p>c. Dissemination to Talang Petai Estate employees on 5 August 2019, attended by 29 workers.</p> <p>d. Dissemination to Tanah Rekah Estate employees on 9 September 2019, attended by 33 workers.</p> <p>e. Dissemination to Sei Kiang Estate employees on 24 September 2019, attended by 48 workers including</p>	Comply

		contractors.	
Criteria 6.6:			
No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 	<p>Based on interview with workers and workers union, stated that the unit of certification does not practiced such thing as follows:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 	Comply
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p>	<p>There is no casual worker works at the unit of certification. All workers have status of permanent workers (SKU-B or SKU-H) of temporary worker (PKWT). PKWT is only applicable for probation period. Gradually the status of PKWT has been upgraded to be Permanent Workers (SKU-H), as evidence:</p> <ol style="list-style-type: none"> 1. Appointment Letter of PKWT became SKU-H No.03/RMO-MME/IV/2019 dated 1 April 2019 for 14 harvester in Mukomuko Estate. 2. Appointment letter of PKWT became SKU-H No.20/RMO-MME/X/2019 dated 2 October 2019 for 7 harvester in Mukomuko Estate. 3. Appointment letter from SKU-H to SKU-B No.209/JWB-RMOBG/IX/2019 dated 16 November 2019 for 3 workers of Sungai Kiang Estate, Air Buluh Estate and CWAM (Central Workshop). 4. Appointment letter of PKWT became SKU-H No.31/TRE-RMO/VI/2019 dated 20 June 2019 for 2 workers in Tanah Rekah Estate. <p>For other types of work, PT Agromuko collaborates with local labor service providers to do seasonal work such as Replanting.</p>	Comply
Criteria 6.7:			

The unit of certification ensures that the working environment under its control is safe and without undue risk to health.		
<p>6.7.1</p>	<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>PT Agromuko – Bunga Tanjung POM has appointed the responsible person(s) for H&S is identified, such as:</p> <p>Air Buluh Estate:</p> <ul style="list-style-type: none"> • OHS expert namely Mr Sudiro as Degree Letter from Manpower Ministry Republic of Indonesia Nomor: KEP.3796/NAKER-BINWASK3/V/2017 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Tenaga Ketenagakerjaan, issued dated 31st May 2017 – valid until 3 years • Surat Permohonan Pendaftaran Kepengurusan P2K3LHS No 349/ABE/XI/2019, dated 5th November 2019 <p>Malin Deman Estate:</p> <ul style="list-style-type: none"> • OHS expert namely Mr Mugiono as Degree Letter from Manpower Ministry Republic of Indonesia Nomor: KEP.P.6195/NAKER-BINWASK3/IX/2017 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Tenaga Ketenagakerjaan, issued dated 20th September 2017 – valid until 3 years. • Surat Permohonan Pendaftaran Kepengurusan P2K3LHS No 54/RMO-G/X/19, dated 28th October 2019 <p>Bunga Tanjung Estate:</p> <ul style="list-style-type: none"> • Berita Acara Perubahan Susunan Kepengurusan P2K3LHS dated 1 October 2019 • OHS expert namely Mr Samuel Sihombing as Degree Letter from Manpower Ministry Republic of Indonesia Nomor: KEP.P.3795/NAKER-BINWASK3/V/2017 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Tenaga Ketenagakerjaan, issued dated 31st May 2017 – valid until 3 years. <p>Air Bikuk Estate:</p> <ul style="list-style-type: none"> • OHS expert (Ahli K3) namely Mr Frisai Hafiz Marpaung – license as OHS expert candidate number. KEP.17541/NAKER-BINWASK3/V/2018, valid until 3 years. • Minute of Meeting of the OHS committee (monthly), last meeting was conducted on 29th October 2019 – location in Meeting Room Air Bikuk Estate. Agenda: review on progress of follow up action from previous meeting issues, review on the OHS inspection report, review of accidents in month October 2019 and other issues. <p>The record of effectiveness of implementation the OHS Committee program, e.g:</p> <ul style="list-style-type: none"> • Record of OHS meeting dated 2nd November 2019, location in Air Buluh Estate, agenda: Review of the meeting result of the last, review of OHS inspection and review of incident report • Report of OHS performance for period July – September 2019 was sent to Manpower Agency in Bengkulu

		<p>Province both for Air Buluh Estate and Malin Deman Estate.</p> <ul style="list-style-type: none"> Record of OHS meeting dated 11 November 2019, location in Bunga Tanjung Estate. Agenda: review the progress action of the OHS plan in month October 2019, review of report 	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT Agromuko – Bunga Tanjung POM has prepared the procedure of accident and emergency as per document of Incident Report, No: OHS-01-08, issued date 4th February 2019 version 0.</p> <p>Steps to Report Incidents:</p> <ol style="list-style-type: none"> Applies to all accidents, diseases and incidents that occur in the PT TTI environment The initial date that must be given if an incidents occur is: <ul style="list-style-type: none"> Date and time occur Location of the incidents Name and or number of victims Activity at the time of incidents The is injury or death <p>The procedure available in appropriate language of the workforce and has been socialization to all workers, e.g: Attendance list on socialization of accidents procedure dated 15th June 2019.</p> <p>Bunga Tanjung Estate has assigned operatives trained in First Aid are present in both field and other operations, e.g: namely Mr Jhon Hartoni (license as first aider No: 560/027/D.3/IV/P3K/2015 – issued by Manpower Agency in Mukomuko Regency) and Mr Yanto (license as first aider No: 560/024/D.3/IV/P3K/2015 – issued by Manpower Agency in Mukomuko Regency).</p> <p>Record of all accident has kept and periodically review under OHS committee meeting (P2K3LHS) each month.</p> <p>Data verified:</p> <ul style="list-style-type: none"> Total accident in year 2019 is 2 cases (category: medium). Each accident has conducted the investigation, e.g: "Report of Accidents Investigation – No 01-BTE-2019-07-AC-WP, dated 11th July 2019 for namely Mr John Pranata (Supervisor in Harvesting), location in block C2 in division 01. Recommendation of corrective action has followed up. List of first aid equipment as monitored in "Daftar Kotak P3K", there was 15 portable first aid and 3 first aid 	Comply

		<p>in office, chemical storage and temporary storage hazardous waste</p> <ul style="list-style-type: none"> • License for first aider number 560/012/D.3/IV/P3K/2015 namely Mr H.M Sianturi, number 560/062/D.3/IV/P3K/2015 namely Mr Tohidan 	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Agromuko – Bunga Tanjung POM has shown the document of Labor Agreement as per “Perjanjian Kerja Bersama 2018-2020”, in chapter XIV mentioned OHS equipment including PPE was provided free of charge to all workers at the place of works to cover all potentially hazardous operations.</p> <p>Based on viist in chemical storage (pesticides) in Air Buluh Estate and Bunga Tanjung Estate, there was a facilities related to OHS, e.g: sanitation facilities, PPE, eye wash and the facilities to put personal clothing.</p> <p>Data verified: Record on hand over of PPE for all workers, e.g:</p> <ul style="list-style-type: none"> • Dated 31st October 2019 there was 12 uniform (apron) for chemical applicator, hand gloves PVC blue color, plastic googles and cotton mask respiartor black color • Dated 23rd September 2019 there was 48 AP boot for harvester in Air Buluh Estate <p>Field assistant routine conduct the OHS inspection on PPE use (together with Muster Chit Field Work), e.g:</p> <ul style="list-style-type: none"> • Checklist report of PPE use for workers on chemical (pesticides) application, dated 30th October 2019 location in Division Inti in Malin Deman Estate – result reported OK • Report of Muster Chit dated 22nd October 2019, location in Division I in Air Buluh Estate on monitoring of PPE use for 31 harvesters – reported OK. • Record of handover PPE (AP Boot) for 78 harvesters in Division I Bunga Tanjung Estate, dated 15th January 2019 • Record of handover safety shoes for generator operator (namely Mr Wiwit S – location in division F6) in Bunga Tanjung Estate, dated 15th January 2019. <p>OHS licensed for heavy equipment and machinery operators in Bunga Tanjung POM, such as:</p> <ul style="list-style-type: none"> • OHS license number: 10424.OPK3-PUBT-B.I/XII/2016 for engine room operator, namely Mr Skhab Khasbullah, dated 2nd December 2016 – valid until 5 years • OHS license number: 10421.OPK3-PUBT-B.I/XII/2016 for sterilizer operator, namely Mr Hendri Rahmad, dated 2nd December 2016 – valid until 5 years 	Comply

		<ul style="list-style-type: none"> • OHS license number: 79612.OPK3-LT/PAA/XI/2016 for operator of loader, namely Mr ZUhartoni, dated 23th November 2016 – valid until 5 years • Report of testing and monitoring of Turbin Uap I (Pembangkitan Tenaga Listrik), no report: 176/EVALUASI/K3-PL-03/2018 tentang Evaluasi Hasil Pemeriksaan Pembangkitan Listrik (Kap 1000 kVA), dated 15th November 2018 – issued by Manpower Agency in Bengkulu Province. • Report of Testing on Monitoring of “Instalasi Penyalur Petir”, register number: 48/SK/K3PETIR-03/2017, conducted on 18th November 2017 by PJK3 and acknowledge by Manpower Agency in Bengkulu Province. • Permit on providing the electricity unit (generator Kav 500kVA) as per “Keputusan Kelapa Kantor Pelayanan Terpadu Satu Pintu Kabupaten Mukomuko Nomor: 503/04/KPTSP/ITL/II/2015 tentang Izin Operasi Penyediaan Tenaga Listrik Untuk Kepentingan Sendiri, dated 27th March 2015 – valid until 5 years. • Special Medical Check Up for operator in high risk area in Bunga Tanjung POM was conducted by Anugerah Ibu Laboratory – Medan (annually), last MCU on 24th September 2019, was attended by 31 workers in Bunga Tanjung POM consist of bolier operator, engine room operator, sterilizer operator, mechanic, steam boiler operator. The result still in prepared by Anugerah Ibu Laboratory. 	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.</p>	<p>PT Agromuko – Bunga Tanjung POM provide all workers will medical care and covered by accidents insurance, the statement as mentioned Labor Agreement year 2018-2020 in chapter XIII Jaminan Sosial dan Bantuan Sosial.</p> <p>Based on interview with sample workers during field visit and consultation with labor union, they were stated all workers in PT Agromuko are provided with medical care and accident under BPJS Kesehatan and PBJs Ketenagakerjaan.</p> <p>Data verified:</p> <ul style="list-style-type: none"> • Record of payment of accident insurance (BPJS Ketengakerjaan) for month October 2019, reference number: 19100494457, total IDR XX,071,881 was covered for 368 wokers (all workers) in Air Buluh Estate, dated 22nd October 2019 • Record of payment of accident insurance (BPJS Ketengakerjaan) for month October 2019, reference number: 191005021520, total IDR XX,449,024 was covered for 166 wokers (all workers) in Malin Deman Estate, dated 22nd October 2019 • Record of payment of accident insurance (BPJS Ketenagakerjaan) in Bunga Tanjung Estate month November 2019, payment code: 1919005096940 total IDR XX,617,948 – status PAID via Mandiri Bank dated 22nd October 2019. 	Comply

		<ul style="list-style-type: none"> • Payment record of medical care (BPJS Kesehatan), month October 2019 – was paid on 31st October 2019 (document number: JV19100073), total IDR XX,294,990. 	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Agromuko – Bunga Tanjung POM has shown the record of injuries using lost time accident (LTA) metrics as in “Laporan Kehilangan Waktu Kerja – LTA” year 2019.</p> <ul style="list-style-type: none"> • Malin Deman Estate, in 2019 until November 2019 there was reported 2 cases of accidents, total LTA 13 mandays • Air Buluh Estate, year 2019 there was reported 3 cases of accidents, total LTA 12 mandays. • Bunga Tanjung Estate - total accident in year 2019 is 2 cases (category: medium), total LTA is 4 mandays. Each accident has conducted the investigation and followed up with corrective action. 	Comply
<p>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</p>			
<p>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<p>It was available documented IPM Program under “Program Pengendalian Hama Terpadu Tahun 2019” for each Estate and Scheme Smallholders. Program consist of monitoring of barn-owl nest; repair of barn-owl nest; identification of beneficial weeds that grown in plantation area; census of Ganoderma; planting of <i>Turnera</i>, <i>Antigonon</i> and <i>Casia tora</i>; identification of natural predator of leaf eater caterpillar.</p> <p>In Air Buluh Estate, pest and disease census period Oct 2019 in block 99I01A indicates no leaf eater caterpillar infestation. Pest and disease census period Oct 2019 indicates no ganoderma identified in Division 2. In Malin Deman Estate, pest and disease census period Oct 2019 in block 13G05 indicates no leaf eater caterpillar infestation. Pest and disease census period Oct 2019 indicates no Rat and Termite attack identified in Malin Deman Estate.</p> <p>In Air Bikuk Estate, monitoring of barn-owl period Oct 2019 mentioned that there are 5 barn-owl nest in Division 2, located in Block L02, N02, J02, K01 and P02; 3 barn-owl nest in Division 3, located in Block U01 and D01. Barn-owl nest was observed at Block 19J02. Beneficial weed, <i>Antigonon leptopus</i> was observed at Block 19H02 and 19J01A. Pest and disease census period Nov 2019 in block P01 Division 2 Air Bikuk Estate, indicates no leaf-eater caterpillar infestation.</p> <p>Plasma Air Buluh and Plasma Air Merah, pest and disease census period Oct 2019 indicates no leaf eater caterpillar infestation. Pest and disease census period Oct 2019 indicates no Rat attack and termite identified in Malin Deman Plasma.</p> <p>KMD Pulau Baru and KMD Medan Jaya pest and disease census period Oct 2019 indicates no leaf-eater</p>	Comply

		caterpillar infestation. KMD Pulau Baru and KMD Medan Jaya pest and disease census period Oct 2019 indicates no rat and termite attack identified.																															
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	The company can provided "100 of the World's Worst Invasive Alien Species" a selection from the Global Invasive Species Database, published by Invasive Species Specialist Group (ISSG) in association with IUCN, Species Survival Commission and Bionet. Based on field visit, there is no species listed in the document used in Air Buluh Estate, Malin Deman Estate, Malin Deman Plasma and KMD.	Comply																														
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. [For NI to define process]	Based on filed visit and document review, there is no use of fire for pest control in whole area of Air Buluh Estate, Malin Deman Estate, Bunga Tanjung Estate, Air Bikuk Estate, Malin Deman Plasma and KMD.	Comply																														
Criteria 7.2:																																	
Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																																	
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	<p>The company has recorded list of herbicide used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.</p> <table border="1"> <thead> <tr> <th>Trademark</th> <th>Active Ingredient</th> <th>WHO Class</th> <th>Target</th> <th>Registration Number</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td>Smart 486 SL</td> <td>Isopropil amina glifosat</td> <td>U</td> <td>Grasses weed</td> <td>RI.01030119971313</td> <td>12/11/2023</td> </tr> <tr> <td>Metsulindo 20 WP</td> <td>Metil metsulfuron</td> <td>U</td> <td>Ferns, Broad Leaf, Sedges</td> <td>RI.01030119991484</td> <td>05/05/2021</td> </tr> <tr> <td>Garlon 670 EC</td> <td>Triclopir butoksi etil ester</td> <td>III</td> <td>Drus Weeds/Wood</td> <td>RI.0103011984695</td> <td>30/12/2023</td> </tr> <tr> <td>Basta 150 SL</td> <td>Amonium glufosinat</td> <td>III</td> <td>Grass weed, broad leaf</td> <td>RI.01030119921113</td> <td>12/12/2020</td> </tr> </tbody> </table>	Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date	Smart 486 SL	Isopropil amina glifosat	U	Grasses weed	RI.01030119971313	12/11/2023	Metsulindo 20 WP	Metil metsulfuron	U	Ferns, Broad Leaf, Sedges	RI.01030119991484	05/05/2021	Garlon 670 EC	Triclopir butoksi etil ester	III	Drus Weeds/Wood	RI.0103011984695	30/12/2023	Basta 150 SL	Amonium glufosinat	III	Grass weed, broad leaf	RI.01030119921113	12/12/2020	Comply
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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>Herbicide use in Bunga Tanjung Estate 2019 (up to Oct):</p> <table border="1"> <thead> <tr> <th>Trademark</th> <th>Volume (L or kg)</th> <th>LD50 Skin (mg/kg bw)</th> <th>A.I.</th> <th>A.I./Ha</th> <th>Toxicity</th> </tr> </thead> <tbody> <tr> <td>Smart 486 SL</td> <td>3,573.63</td> <td>5000</td> <td>1,736.78</td> <td>0.7511</td> <td>0.00015022</td> </tr> <tr> <td>Metsulindo 20 WP</td> <td>111.29</td> <td>5000</td> <td>22.26</td> <td>0.0096</td> <td>0.00000192</td> </tr> <tr> <td>Basta 150 SL</td> <td>448.00</td> <td>2000</td> <td>67.25</td> <td>0.0291</td> <td>0.00001455</td> </tr> </tbody> </table> <p>Herbicide use in Air Bikuk Estate and KMD 2019 (up to Oct):</p> <table border="1"> <thead> <tr> <th>Trademark</th> <th>Volume (L or kg)</th> <th>LD50 Skin (mg/kg bw)</th> <th>A.I.</th> <th>A.I./Ha</th> <th>Toxicity</th> </tr> </thead> <tbody> <tr> <td>Smart 486 SL</td> <td>1,970</td> <td>5000</td> <td>957.42</td> <td>0.7837</td> <td>0.000015</td> </tr> <tr> <td>Metsulindo 20 WP</td> <td>101</td> <td>5000</td> <td>20.20</td> <td>0.0165</td> <td>0.000003</td> </tr> <tr> <td>Basta 150 SL</td> <td>160</td> <td>2000</td> <td>24.00</td> <td>0.0196</td> <td>0.000009</td> </tr> <tr> <td>Garlon 670 EC</td> <td>63</td> <td>5000</td> <td>42.21</td> <td>0.0345</td> <td>0.000006</td> </tr> </tbody> </table> <p>Herbicide Smart 486 SL use in KMD under Bunga Tanjung Estate in 2019 (up to Oct):</p> <table border="1"> <thead> <tr> <th>KMD</th> <th>Ha</th> <th>FFB</th> <th>Volume (L)</th> <th>A.I. (gr)</th> <th>A.I./Ha (gr/Ha)</th> <th>A.I/Ton FFB (gr/Ton)</th> </tr> </thead> <tbody> <tr> <td>Nelan Indah</td> <td>11.2</td> <td>1,254</td> <td>29.1</td> <td>14,142.6</td> <td>1.26</td> <td>0.00101</td> </tr> <tr> <td>Nenggalo</td> <td>15</td> <td>146</td> <td>5</td> <td>2,430.0</td> <td>0.16</td> <td>0.00111</td> </tr> <tr> <td>Pondok Baru</td> <td>15</td> <td>201</td> <td>10.25</td> <td>4,981.5</td> <td>0.33</td> <td>0.00165</td> </tr> <tr> <td>Bunga Tanjung</td> <td>15</td> <td>502</td> <td>10.25</td> <td>4,981.5</td> <td>0.33</td> <td>0.00066</td> </tr> </tbody> </table>	Trademark	Volume (L or kg)	LD50 Skin (mg/kg bw)	A.I.	A.I./Ha	Toxicity	Smart 486 SL	3,573.63	5000	1,736.78	0.7511	0.00015022	Metsulindo 20 WP	111.29	5000	22.26	0.0096	0.00000192	Basta 150 SL	448.00	2000	67.25	0.0291	0.00001455	Trademark	Volume (L or kg)	LD50 Skin (mg/kg bw)	A.I.	A.I./Ha	Toxicity	Smart 486 SL	1,970	5000	957.42	0.7837	0.000015	Metsulindo 20 WP	101	5000	20.20	0.0165	0.000003	Basta 150 SL	160	2000	24.00	0.0196	0.000009	Garlon 670 EC	63	5000	42.21	0.0345	0.000006	KMD	Ha	FFB	Volume (L)	A.I. (gr)	A.I./Ha (gr/Ha)	A.I/Ton FFB (gr/Ton)	Nelan Indah	11.2	1,254	29.1	14,142.6	1.26	0.00101	Nenggalo	15	146	5	2,430.0	0.16	0.00111	Pondok Baru	15	201	10.25	4,981.5	0.33	0.00165	Bunga Tanjung	15	502	10.25	4,981.5	0.33	0.00066	Comply
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		Bantal	15	164	10.25	4,981.5	0.33	0.00202	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	There is no use of prophylactic use of pesticides throughout PT. Agro Muko, PT. Mukomuko Agro Sejahtera and in Kebun Masyarakat Desa/KMD. In general, there is no use of pesticide to control pest in PT. Agro Muko and PT. Mukomuko Agro Sejahtera.							Comply
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best	There is no use of prophylactic use of pesticides throughout PT. Agro Muko, PT. Mukomuko Agro Sejahtera and in Kebun Masyarakat Desa/KMD. In general, there is no use of pesticide to control pest in PT. Agro Muko and PT. Mukomuko Agro Sejahtera.							Comply
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat	PT Agro Muko and PT Mukomuko Agro Sejahtera are not using pesticide Class I and Class II. Despite paraquat is not prohibited in Indonesia, company committed to avoid use of Paraquat. The company has commitment to eliminated using Paraquat since 1 January 2017 based on General Manager letter No.35/GMAM-Est/XII/2015, dated 8 December 2015. Visit to chemical store and record review upon "Rekaman Penggunaan Pestisida Per Metric Ton FFB tahun 2019" shows company chemical product for specific target species (weed), and no paraquat.							Comply
	7.2.5b Why there is no other alternative which can be used	There are no use of pesticide Class I and Class II in PT Agro Muko and PT Mukomuko Agro Sejahtera.							
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative	There are no use of pesticide Class I and Class II in PT Agro Muko and PT Mukomuko Agro Sejahtera.							
	7.2.5d What is the process to	There are no use of pesticide Class I and Class II in PT Agro Muko and PT Mukomuko Agro Sejahtera.							

	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.	There are no use of pesticide Class I and Class II in PT Agro Muko and PT Mukomuko Agro Sejahtera.	
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 carry out.	<p>The company has provided training for all workers that conducted chemical spraying including for Scheme Smallholders (KMD and Plasma), as evidence in "Hasil Pelatihan Spraying dan Kalibrasi Alat Semprot" dated 25 Oct 2019 in Air Buluh Estate. The training was attended by:</p> <ol style="list-style-type: none"> 1. 22 spraying workers of Air Buluh Estate; 2. 3 spraying workers of KMD; 3. 11 spraying workers of Malin Deman Estate; 4. 5 spraying workers of Plasma Air Merah; 5. 4 spraying workers of Plasma Air Buluh. <p>Training of spraying and chemical handling in Bunga Tanjung Estate:</p> <ol style="list-style-type: none"> 1. 11 spraying workers of Division 1, on 9 Apr 2019; 2. 7 spraying workers of Division 2, on 12 Apr 2019; 3. 11 spraying workers of Division 3, on 12 Apr 2019. <p>Training of spraying and chemical handling in Air Bikuk Estate on 7 Feb 2019:</p> <ol style="list-style-type: none"> 1. 11 spraying workers of Division 1; 2. 5 spraying workers of Division 2; 3. 8 spraying workers of Division 3. <p>Training module, evaluation result and attendance list were available. Handover of PPE to spraying worker of Division 1 and 2 Air Bikuk Estate dated 10 Oct 2019, consist of 15 pcs Apron (shift type orange colour); 15 pcs Hand gloves PVC blue colour; 15 pcs Cotton mask black colour and 15 pcs plastic goggles.</p>	Comply
7.2.7	(C) Storage of all pesticides is in accordance with recognised best practices.	<p>PT Agromuko – Bunga Tanjung POM has prepared the procedure on Using, Storing and Discarding Agrochemicals No OPM-09-03, dated 22nd March 2019 revision 4 dated 27th March 2019.</p> <p>Step the procedures:</p> <ol style="list-style-type: none"> 1. Agrochemical selection: Agrochemical used are registered and permitted by Ministry of Agriculture Republic of Indonesia and the hazard classification according to WHO. 	Comply

		<ol style="list-style-type: none"> 2. Mixing area 3. Measuring, diluting and mixing agrochemicals 'Supply and distribution of spray solution 4. Agrochemical storage: <ul style="list-style-type: none"> - The go down door must be tightly closed and locked when there is no activity - Put a sign on storage room, such as: toxic and hazardous material (B3), flammable material, irritants and explosive materials - On agrochemical labels and the MSDS each type of active ingredient - Apply the principle of first in first out (FIFO) - Provided a second containment or pad that can hold the liquid if leakage occurs 5. Management of used agrochemical containers 6. Agrochemical transportation <p>Based on field visit in pesticides storage in Air Buluh Estate, Malin Deman Estate and Bunga Tanjung the storage of agrochemical was according to recognized best practices. Facilities in Pesticides storage e.g: eye wash, PPE, first aid kit, secondary containment.</p>	
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	<p>PT Agromuko – Bunga Tanjung POM has prepared the procedure for handling of all pesticides containers as per Procedure on Management of Hazardous and Toxic Waste Material nomor doc: ENC 01-10/04-03-2019/Rev.1, date of issued 18th March 2019.</p> <p>Step the procedures:</p> <ol style="list-style-type: none"> 1. Identification of hazardous waste 2. Data collection 3. Instalation of hazardous waste risk and hazardous symbols 4. Review of waste management 5. Making a contract (SPK) with carrier 6. Transportation in accordance with contract (SPK) <p>Data verified:</p> <ol style="list-style-type: none"> 1. Bunga Tanjung Estate – “Berita Acara Serah Terima Limbah Bahan Berbahaya dan Beracun (record of handover of hazardous waste)”, to CV Amindy Barakah Sumut (licensed three party on handling of hazardous waste) dated 27th August 2019, consisted of: 	Comply

		<ul style="list-style-type: none"> - Oil used 795 liters - Fuel filter used 71 Kg - Printer cartridge 20 Kg - Medical waste 7.3 Kg - Empty pesticides container 7.5 Kg <p>2. Hazardous waste manifest no: 0011631, for oil used (794 liters), dated 27th August 2019</p> <p>3. Hazardous waste manifest no: 0011632, for filter used (71 Kg), dated 27th August 2019</p> <p>Air Bikuk Estate,</p> <ul style="list-style-type: none"> • Permit of temporary storage hazardous waste under “Keputusan Kepala Dinas Penanaman Modal Pelayanan Perizinan dan tenaga Kerja Kabupaten Mukomuko – nomor: 503/08/D.10/IPLB3/VII/2017 tentang Pemberian Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT Agromuko – Air Bikuk Estate”, dated 21st July 2017 valid until 5 years. • Berita Acara Serah Terima Barang – Limbah Bahan Berbahaya dan Beracun kepada CV Amindy Barakah dated 27th August 2019, such as: empty chemical container (42.1 Kg) • Hazardous waste manifest number AVT 0011630, shipping description for type of waste: empty chemical container (30 Kg), dated 27th August 2019, was sent to CV Amindy Barakah, vehicle number: BK 8798 MN 	
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	There is no aerial application of pesticide in PT Agro Muko and PT Mukomuko Agro Sejahtera.	Comply
7.2.10	(C) Specific annual medical surveillance for pesticide	PT Agromuko – Bunga Tanjung POM has conducted a specific annual medical checkup for pesticides operator on 24 th September 2019 by Klinik Anugerah Ibu – Medan, North Sumatera, was attended by 34 workers.	Comply

	<p>operators, and documented action to treat related health conditions, is demonstrated.</p>	<p>The result of medical checkup still in progress on finalization by the Klinik.</p> <p>Bunga Tanjung Estate has also conducted general medical checkup per 3 months, conducted by Paramedical Company. Last general medical on 6th August 2019. Data verified: "Formulir Pemeriksaan Medis – Pekerja Pemakaian Pestisida (Bahan Kimia) e.g: namely Mrs Maida Siregar (staff number 1294 – sprayers), Mrs Susi G p (staff number 0539 – sprayer), Mr Ibnu Harono (staff number 0513 – Sprayer)</p> <p>Air Bikuk Estate: Record of specific annual medical surveillance for pesticides operator has shown under document of "Laporan Pelaksanaan General Medical Check Up", last MCU conducted by Klinik Spesialis Anugerah Medan – on 25th September 2019, was attended by 25 workers.</p>	
<p>7.2.11</p>	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p>	<p>Based on verification document and interview with workers in chemical handling there was no work with pesticides ae undertaken by person under the age of 18 years old, pregnant or breast feeding women or other people that have medical restrictions.</p> <p>Air Buluh Estate:</p> <ol style="list-style-type: none"> 1. Surat Keterangan Hamil – dated 12th September 2019, namley Mr Setiawati (register number 336), worker in manuring application, identified pregnant since 12th September 2019. 2. Attendance and work allocation for Mrs Sestiawati dated 13th September 2019; activity upkeep empalcement (no pesticides/chemical contact). 3. Surat Keterangan Hamil – dated 2nd November 2019, namley Mr Sri Mulyani (register number 625), worker in pesticides application, identified pregnant. 4. Attendance and work allocation for Mrs Sri Mulyani dated 4th November 2019; activity upkeep emplacement (no pesticides/chemical contact). <p>Air Bikuk Estate: Based on document of monitoring workers in handling of pesticides there was no reported workers in pregnant or breast-feeding condition, data seen: "Absen Tenaga Spraying Perempuan Hamil/Tidak Hamil dan Menyusui" year 2019.</p> <p>There was no worker in handling pesticides under the age of 18 years old, the youngest is Mr Candra (male –</p>	<p>Comply</p>

		21 years old and 4 months).	
Criteria 7.3:			
Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	<p>PT Agromuko – Bunga Tanjung POM has shown the document a waste management plan as per “Rencana Pengelolaan Sampah year 2019”</p> <p>Record of send the hazardous waste to licensed interested parties,</p> <ol style="list-style-type: none"> 1. Hazardous waste manifest no. AVT 0011617 for oil used (650 liters), was sent to PT Amindy Baraka,dated 27th August 2019 – vehicle BK 8798 MN 2. Hazardous waste manifest no. AVT 0011618 for filter used (56 kg), was sent to PT Amindy Baraka,dated 27th August 2019 – vehicle BK 8798 MN 3. Hazardous waste manifest no. AVT 0011621 for empty chemical container (127 kg), was sent to PT Amindy Baraka,dated 27th August 2019 – vehicle BK 8798 MN <p>Malin Deman Estate:</p> <ol style="list-style-type: none"> 1. Laporan Kegiatan Pengolahan dan Penyimpanan Limbah B3 Periode Juni s/d Agustus 2019, was sent to Environmental Ministry Republic of Indonesia, document number: 067/Laporan-B3/MDE/2019, dated 5th September 2019. 2. Berita Acara Serah Terima Barang – Limbah Bahan Berbahaya dan Baracun kepadda CV Amindy Barakah dated 27th August 2019 consisted of: <ul style="list-style-type: none"> • Oil used (125 liter) • Filter used (10 Kg) • Empty chemical container (30 Kg) • Kain majun (3 Kg) <p>Air Bikuk Estate,</p> <ol style="list-style-type: none"> 1. Berita Acara Serah Terima Barang – Limbah Bahan Berbahaya dan Baracun kepadda CV Amindy Barakah dated 27th August 2019 consisted of: <ul style="list-style-type: none"> • Oil used (209 liter) • Filter used (41.5 Kg) • Empty chemical container (42.1 Kg) • Kain majun (10 Kg) 	Comply

		<ul style="list-style-type: none"> • Medical waste (3.8) <p>2. Hazardous waste manifest number AVT 0011630, shipping description for type of waste: empty chemical container (30 Kg), dated 27th August 2019, was sent to CV Amindy Barakah, vehicle number: BK 8798 MN</p> <p>3. Hazardous waste manifest number AVT 0011626, shipping description for type of waste: oil used (209 liters), dated 27th August 2019, was sent to CV Amindy Barakah, vehicle number: BK 8798 MN</p>	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>Landfill block 9901A, in Air Buluh Estate in division 3 (covering for emplacement in division 1, 2 and 3)</p> <p>Landfill location in block 17A01.</p> <p>Permit for domestic was as required PerMenLHK No tahun 2016,</p>	Comply
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>PT Agromuko – Bunga Tanjung POM prepared the procedure of waste management” as per Standard Operation Procedure on “Pengelolaan Sampah”, no: SOP/General/ESD, revision 0) issued date 1st March 2010. In point 6.1.1. mentioned the waste disposal not allowed to uses open fire.</p> <p>The procedure has communicated to all workers together with Muster Chit in every morning, e.g: dated 14th November 2019, location in Division F3 in Bunga Tanjung Estate.</p>	Comply
Criteria 7.4:			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	<p>The company has established SOP to managed soil fertility in whole plantation area include Scheme Smallholder to gain optimum yield and minimising environmental impact. The SOPs are as follows:</p> <ol style="list-style-type: none"> 1. OPM-06-01; dated 02/10/2017; Inorganic Fertiliser – Pupuk Inorganik. 2. OPM-06-02; dated 02/10/2017; Organic Fertiliser – Pupuk Organik 3. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman. 4. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel. <p>The company has conduct Leaf Sample analysis, as basic of fertilizer recommendation. Estates and Scheme Smallholder conduct fertilizer application based on fertilizer recommendation.</p>	Comply
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility	<p>Leaf and rachis analysis in Bunga Tanjung Estate was carried out on December 2017 takes 37 leaf samples and 37 rachis samples, analysis result issued on 24 January 2018. This analysis was performed by PT. Central Alam Resources Lestari. Sampled leaf and rachis taken from oil palm in among others Block 99P01A, 99P02A,</p>	Comply

	and plant health.	<p>99P03A, 99P04A, 06NV1A and 06NU1A. Sample seen: Lab. Code TP1712320L13535; Block 06NV1A; Division 5; analysis result 2.45% N; 0.137% P; 0.78% K; 0.23% Mg; 0.64% Ca and 15.2 ppm B.</p> <p>Latest soil analysis in Bunga Tanjung and Sungai Bikuk Estate was conducted in year 2009, from Soil Science Faculty of Agriculture Bengkulu University. Based on the soil analysis the soil texture consist of sandy loam and loam. Analysis result in Bunga Tanjung Estate: pH H₂O 4.4; pH KCl 4.2; 1.68% C; 0.13% N; and 8.74 ppm P₂O₅.</p> <p>In Air Buluh Estate, soil analysis carried out by JH Agriculture on 2010. This exercise includes soil analysis for KMD and cooperative (Scheme Smallholder).</p>																						
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	<p>EFB application in Bunga Tanjung Estate in 2019 were recorded in Block 98D02A; EFB applied in Jan 63 ton; Jun 197 ton; Jul 54 ton; Aug 25 ton; total area applied 5.78 Ha. In Block 01A01A; EFB applied 44 ton; area applied 1 Ha. In Block 98E01A; EFB applied 41 ton; area applied 1 Ha.</p> <p>EFB application in air Bikuk Estate in 2019 were recorded in Block 19G01; EFB applied in May 396.00 ton; Jun 171.94 ton; total 567.94 ton. In Block 19G02; EFB applied in Jun 94.82 ton; Jul 70.80 ton; Aug 98.10 ton; Sep 120.00 ton.</p> <p>There is no POME application in all plantation estates, palm oil mill waste are discharge to water.</p>	Comply																					
7.4.4	Records of fertiliser inputs are maintained.	<p>Fertilizer application conducted following fertilizer recommendation issued by Verdant Bioscience (PT. Timbang Deli Indonesia), subsidiary of Sipef Group.</p> <p>Recapitulation of fertilizer input in Bunga Tanjung Estate for 2019:</p> <table border="1"> <thead> <tr> <th>Fertilizer Type</th> <th>Program (kg)</th> <th>Realisation (kg)</th> </tr> </thead> <tbody> <tr> <td>Urea</td> <td>462,200</td> <td>462,200</td> </tr> <tr> <td>CIRP</td> <td>494,350</td> <td>494,350</td> </tr> <tr> <td>MOP</td> <td>185,200</td> <td>185,200</td> </tr> <tr> <td>Dolomite</td> <td>37,950</td> <td>37,950</td> </tr> <tr> <td>Borate</td> <td>2,750</td> <td>2,740</td> </tr> <tr> <td>Compound 16:10:19:6</td> <td>869,438</td> <td>587,026</td> </tr> </tbody> </table> <p>Evidence: Store Request/Issued Note No.027167 and Bunga Tanjung Enter Stock Issue No.SI00032286 dated 12 Nov 2019. For Division 2; Item 1131400060; Description NPK 16-10-19-6+0.5B; CC ID 98G01A; Quantity 3,031 kg.</p>	Fertilizer Type	Program (kg)	Realisation (kg)	Urea	462,200	462,200	CIRP	494,350	494,350	MOP	185,200	185,200	Dolomite	37,950	37,950	Borate	2,750	2,740	Compound 16:10:19:6	869,438	587,026	Comply
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Compound 16:10:19:6	869,438	587,026																						

Recapitulation of fertilizer input in Air Bikuk Estate for 2019:

Fertilizer Type	1 st Semester	
	Program (kg)	Realisation (kg)
Urea	104,850	104,850
CIRP	131,950	131,950
TSP	49,850	49,850
MOP	105,800	105,800
Kieserite	26,500	26,500
Borate	4,660	4,660
Cpd 16:10:19:6+0.5B	9,400	9,400
Cpd 15:15:6:4	4,250	4,250

Fertilizer Type	2 nd Semester	
	Program (kg)	Realisation (kg)
Urea	117,800	117,800
TSP	34,050	34,050
MOP	90,400	90,400
Kieserite	65,850	65,850
Borate	3,780	3,780
Cpd 16:10:19:6+0.5B	107,300	107,300

Fertilizer input for KMD under Bunga Tanjung Estate in 2019: fertilizer type Compound 16:10:19:6; program 38,726 kg; realisation 19,350 kg (1st Semester)..

KMD	1 st Semester	
	Program (kg)	Realisation (kg)
Bantal	3,780	3,780
Nenggalo	3,918	3,918
Pondok Baru	4,250	4,250
Bunga Tanjung	3,548	3,548
Nelan Indah	3,855	3,855
Total KMD	19,350	19,350

		<p>Fertilizer input for KMD under Air Bikuk Estate in 2019: fertilizer type Compound 16:10:19:6+0.5B; program 18,800 kg; realisation 9,400 kg (1st Semester).</p> <table border="1"> <thead> <tr> <th rowspan="2">KMD</th> <th colspan="2">1st Semester</th> </tr> <tr> <th>Program (kg)</th> <th>Realisation (kg)</th> </tr> </thead> <tbody> <tr> <td>Air Bikuk</td> <td>3,250</td> <td>3,250</td> </tr> <tr> <td>Air Berau</td> <td>2,250</td> <td>2,250</td> </tr> <tr> <td>Pondok Suguh</td> <td>3,900</td> <td>3,900</td> </tr> <tr> <td>Total KMD</td> <td>9,400</td> <td>9,400</td> </tr> </tbody> </table>	KMD	1 st Semester		Program (kg)	Realisation (kg)	Air Bikuk	3,250	3,250	Air Berau	2,250	2,250	Pondok Suguh	3,900	3,900	Total KMD	9,400	9,400	
KMD	1 st Semester																			
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Air Bikuk	3,250	3,250																		
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Pondok Suguh	3,900	3,900																		
Total KMD	9,400	9,400																		

Criteria 7.5:
Practices minimise and control erosion and degradation of soils.

7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p>	<p>In Bunga Tanjung Estate, soil map is available dated 17 November 2016, with scale 1:50,000. Based on soil map, the predominant soil map in Bunga Tanjung Estate comprise of <i>Dystrudepts Hapludults</i> with material sediment (mineral) and <i>Dystrudepts Haplohumults</i> with material Alluvium (mineral). The landscape rolling to undulating. From the information, there is no fragile soil.</p> <p>Bunga Tanjung Estate demonstrates topographic map, indicating the area varies between 0-5° up to 15-25°. Area with slope ≥ 25° sets aside as HCV area.</p> <p>Air Buluh Estate demonstrates soil type consist of: <i>Dystropepts, Tropodults, Humitropepts</i> (mineral). Slope class for Air Buluh Estate: 2-12° estimated 230 Ha; 6-20° estimated 1,742 Ha; 12-25° calculated 343 Ha; 20-25° estimated 219 Ha. The limitation slope ≥250. No peat soil.</p> <p>Malin Deman Estate demonstrates soil type consist of Berlian Jaya Series (1,382 Ha) and Mukomuko Series (481 Ha).</p> <p>KMD Nenggalo have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Nenggalo indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Bunga Tanjung have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Bunga Tanjung indicates the slope between 0-5° up to 20-25°.</p>	Comply
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		<p>KMD Nelan Indah have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Nelan Indah indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Bantal have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Bantal indicates the slope between 0-5° up to 20-25°.</p> <p>Plasma Air Buluh have soil map scale 1:35,000. The soil type consist of Berlian Jaya series (125 Ha), Mukomuko series (73 Ha), Kaladan/Tolan series (72 Ha), Binti series/peat soil (31 Ha).</p> <p>Plasma Air Merah have soil map scale 1:35,000. The The soil type consist of Berlian Jaya series (482 Ha), Mukomuko series (198 Ha).</p>	
7.5.2	There is no extensive replanting of oil palm on steep terrain.	Based on field visit to all Estates and KMDs there is no replanting or new planting of oil palm on steep terrain.	Comply
7.5.3	There is no new planting of oil palm on steep terrain.	Based on field visit to all Estates and KMDs there is no new planting of oil palm on steep terrain.	Comply
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) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	<p>PT Agro Muko and PT Mukomuko Agro Sejahtera has carried out soil surveys identifying marginal and fragile soils, including steep terrain, these are taken into consideration in plans and operation. In Bunga Tanjung Estate, soil map is available dated 17 November 2016, with scale 1:50,000. Based on soil map, the predominant soil map in Bunga Tanjung Estate comprise of <i>Dystrudepts Hapludults</i> with material sediment (mineral) and <i>Dystrudepts Haplohumults</i> with material Alluvium (mineral). The landscape rolling to undulating. From the information, there is no fragile soil.</p> <p>Bunga Tanjung Estate demonstrates topographic map, indicating the area varies between 0-5° up to 15-25°. Area with slope $\geq 25^\circ$ sets aside as HCV area.</p> <p>Air Buluh Estate demonstrates soil type consist of: <i>Dystropepts</i>, <i>Tropodults</i>, <i>Humitropepts</i> (mineral). Slope class for Air Buluh Estate: 2-12° estimated 230 Ha; 6-20° estimated 1,742 Ha; 12-25° estimated 343 Ha; 20-25° estimated 219 Ha. The limitation slope $\geq 25^\circ$. No peat soil.</p> <p>Malin Deman Estate demonstrates soil type consist of Berlian Jaya Series (1,382 Ha) and Mukomuko Series</p>	Comply

		(481 Ha). KMD Mundam Marap have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i> , with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Mundam Marap indicates the slope between 0-5° up to 20-25°. Plasma Air Buluh have soil map scale 1:35,000. The soil type consist of Berlian Jaya series (125 Ha), Mukomuko series (73 Ha), Kaladan/Tolan series (72 Ha), Binti series (31 Ha). Plasma Air Merah have soil map scale 1:35,000. The The soil type consist of Berlian Jaya series (482 Ha), Mukomuko series (198 Ha).	
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	There is no extensive planting carried out by PT Agro Muko and PT Mukomuko Agro Sejahtera.	Comply
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	PT Agro Muko and PT Mukomuko Agro Sejahtera is able to present map, consist of information related to the soil type and topographic condition of the Estate. Based on identified soil type, the plantation located on mineral soil – limiting factor identified was steep slope. The resolution from consultant was suitable for oil palm plantation given appropriate management for area with slope. Bunga Tanjung Estate demonstrates topographic map, indicating the area varies between 0-5° up to 15-25°. Area with slope ≥ 25° sets aside as HCV area. Soil surveys and topographic information from Agronomy Department has guide the company in planning of drainage, irrigation systems, roads and other infrastructure.	Comply
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) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Based on soil map dated 17 November 2016, scale 1:50,000, Scope of Unit of Certification Bunga Tanjung POM, there is no peat soil are presence.	Comply
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	Based on soil map dated 17 November 2016, scale 1:50,000, Scope of Unit of Certification Bunga Tanjung POM, there is no peat soil are presence.	Comply

PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).

7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	Based on soil map dated 17 November 2016, scale 1:50,000, Scope of Unit of Certification Bunga Tanjung POM, there is no peat soil are presence.	Comply
7.7.4	(C) A documented water and ground cover management programme is in place.	Based on soil map dated 17 November 2016, scale 1:50,000, Scope of Unit of Certification Bunga Tanjung POM, there is no peat soil are presence.	Comply
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it ii is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.	Based on soil map dated 17 November 2016, scale 1:50,000, Scope of Unit of Certification Bunga Tanjung POM, there is no peat soil are presence.	Comply

PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of

procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.

PROCEDURAL NOTE:

PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues].

7.7.6	(C) All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	Based on soil map dated 17 November 2016, scale 1:50,000, Scope of Unit of Certification Bunga Tanjung POM, there is no peat soil are presence.	Comply
7.7.7	(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	Based on soil map dated 17 November 2016, scale 1:50,000, Scope of Unit of Certification Bunga Tanjung POM, there is no peat soil are presence.	Comply

Criteria 7.8
 Practices maintain the quality and availability of surface and groundwater.

<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: 7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>	<p>The Company has prepared water management plan, for example in Bunga Tanjung Estate, water management plan available under "Program Pengelolaan Air" issued on 4 Jan 2019. The program consist of reporting of deep water usage; quality analysis of deep water; establish silt pit at terrace contour; making individual terrace on plant that have high risk of erosion; pesticide mixing only done in mixing area. The Estate management monitor the progress monthly. The Estate has provide access to clean water for the communities. The Estate has eliminate potential pollution to the water course by conduct mixing of pesticide in the mixing area only.</p>	<p>Comply</p>
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>The Estate has provide access to clean water for the workers by providing deep water. Domestic water usage are reported to the RMO monthly. Based on report of deep water usage in Bunga Tanjung Estate period Oct 2019, total usage of domestic water are as follow: 1. Division F1 (EM House): 613 m³. 2. Division F1 (Labour House): 912 m³. 3. Division F5 (Labour House): 665 m³. 4. Division F3 (Labour House): 645 m³. 5. Division F4 (Labour House): 610 m³. 6. Total 3,445 m³. Deep water analysis was conducted annually, as reported in "Laporan Hasil Uji" No.443.5/636b/Labkes.III dated 27 Dec 2018, issued by UPTD Laboratorium Kesehatan Daerah, Dinas Kesehatan Provinsi Bengkulu". Parameter checked consist of smell, taste, colour, DHL, TSS, temperature, Fe, F, Cu, Mn, NO₃, NO₂, pH, Al, SO₄, BOD, COD, NH₃, Cr, Zn and PO₄. It was verified sample code 05.A/20.12.2018/AS/K and 05.B/20.12.2018/AS/K.</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation</p>	<p>River in PT Agro Muko and PT Mukomuko Agro Sejahtera are protected, buffer zone of riparian are well maintained as observed during field visit. HCV identification in Bunga Tanjung Estate described that: 1. Riparian of Bantal Kanan River: 12.45 Ha; 2. Riparian of Bikuk River: 57.26 Ha; Restoration area of Malin Deman Estate are available at Block 15F04A, the area are planted with Mahoni (<i>Swietenia mahagoni</i>), Gaharu (<i>Aquilaria malaccensis</i>) and Kayu Bawang/Kulim (<i>Scorodocarpus borneensis</i>).</p>	<p>Comply</p>

<p>7.8.3</p>	<p>of riparian reserves' (April 2017). Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p>	<p>Bunga Tanjung POM has monitored the mill effluent to be in compliance with national regulation as per document "Laporan Hasil Analisa Limbah Cair PT Agromuko – Bunga Tanjung POM year 2019.</p> <p>Measurement of mill effluent quality conducted by accreditation environmental testing and laboratory PT Mutu Agung Lestari (registered number: LP-001-IDN). The national regulation as be reference is Degree Letter Gubernur Bengkulu No 92 Tahun 2001 Lampiran 1 tentang Baku Mutu Limbah Cair untuk Industri Minyak Sawit.</p> <p>The result of monitoring year first 2019, such as:</p> <table border="1" data-bbox="680 719 1675 1054"> <thead> <tr> <th>Parameter</th> <th>Satuan</th> <th>Baku Mutu</th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> <th>May</th> <th>Jun</th> <th>June</th> <th>July</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>mg/l</td> <td>100</td> <td>42.8</td> <td>92.4</td> <td>97.4</td> <td>98.2</td> <td>94.7</td> <td>89.6</td> <td>90.2</td> <td>62.4</td> </tr> <tr> <td>COD</td> <td>mg/l</td> <td>350</td> <td>79.1</td> <td>332</td> <td>346</td> <td>343</td> <td>338</td> <td>319</td> <td>328</td> <td>280</td> </tr> <tr> <td>TSS</td> <td>mg/l</td> <td>250</td> <td>6.5</td> <td>6.0</td> <td>7.0</td> <td>5.0</td> <td>13.0</td> <td>9.5</td> <td>11.0</td> <td>12.5</td> </tr> <tr> <td>Minyak & Lemak</td> <td>mg/l</td> <td>25</td> <td><5</td> <td><5</td> <td><5</td> <td><5</td> <td><5</td> <td><5</td> <td><5</td> <td><5</td> </tr> <tr> <td>N</td> <td>mg/l</td> <td>40</td> <td>3.02</td> <td>17.3</td> <td>9.08</td> <td>11.3</td> <td>10.8</td> <td>10.2</td> <td>10.2</td> <td>4.43</td> </tr> <tr> <td>pH</td> <td>mg/l</td> <td>6-9</td> <td>6.98</td> <td>8.00</td> <td>7.68</td> <td>7.78</td> <td>7.43</td> <td>7.39</td> <td>7.90</td> <td>7.22</td> </tr> <tr> <td>NH₃</td> <td>mg/l</td> <td>-</td> <td>1.39</td> <td>9.84</td> <td>5.93</td> <td>6.62</td> <td>6.39</td> <td>6.03</td> <td>0.81</td> <td>2.72</td> </tr> </tbody> </table> <p>Based on the result of monitoring above, all of the parameter are compliance with national regulation.</p> <p>Bunga Tanjung POM has shown the permit to disposed the water effluent as per "Keputusan Kepala Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko, Nomor: 503/01/D.10/IPAL/I/2019 tentang Permemberian Perpanjangan Izin Pembuangan Air Limbah ke Sungai Kepada PT Agromuko Pabrik Pengolahan Minyak Kelapa Sawit Bunga Tanjung POM", dated 16th January valid until 5 years.</p>	Parameter	Satuan	Baku Mutu	Jan	Feb	Mar	Apr	May	Jun	June	July	BOD	mg/l	100	42.8	92.4	97.4	98.2	94.7	89.6	90.2	62.4	COD	mg/l	350	79.1	332	346	343	338	319	328	280	TSS	mg/l	250	6.5	6.0	7.0	5.0	13.0	9.5	11.0	12.5	Minyak & Lemak	mg/l	25	<5	<5	<5	<5	<5	<5	<5	<5	N	mg/l	40	3.02	17.3	9.08	11.3	10.8	10.2	10.2	4.43	pH	mg/l	6-9	6.98	8.00	7.68	7.78	7.43	7.39	7.90	7.22	NH ₃	mg/l	-	1.39	9.84	5.93	6.62	6.39	6.03	0.81	2.72	<p>Comply</p>
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<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded.</p>	<p>PT Agromuko – Bunga Tanjung POM has shown the document of mill water use per tonne of Fresh Fruit Bunches (FFB) in 2019 as per document "Laporan Pemakaian Air Pabrik per MT FFB tahun 2019", such as:</p>	<p>Comply</p>																																																																																								

Months	Water consumption (M ³)	FFB processed (Ton)	Water use per FFB (M ³ /ton FFB)
January	7,225	9,633.98	0.75
February	5,858	8,080.18	0.72
March	6,571	9,526.31	0.69
April	5,723	8,406.91	0.68
May	5,585	8,210.64	0.68
June	5,576	8,313.61	0.67
July	9,763	13,563.95	0.72
August	8,244	11,778.50	0.70
September	8,123	11,719.52	0.69
October	8,380	12,150.55	0.69
Total	71,048	101,414.12	0.70

Bunga Tanung POM has shown the permit of water usage as per "Surat Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat nomor 518/KPTS/M/2018 tentang Pemberian Perpanjangan Izin Pengusahaan Sumber Daya Air kepada Perseroan Terbatas Agro Muko untuk semua Usaha Industri di Sungai Bantal, Kabupaten Mukomuko, dated 3rd August 2018 – valid until 5 years.

Criteria 7.9:

Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported	Usage of HSD Oil per metric ton FFB year 2019, <table border="1"> <thead> <tr> <th>Month</th> <th>Air Buluh Estate (HSD Oil / ton FFB)</th> <th>Malin Deman Estate (HSD Oil / ton FFB)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>6.30</td> <td>11.37</td> </tr> <tr> <td>February</td> <td>6.20</td> <td>10.01</td> </tr> <tr> <td>March</td> <td>6.58</td> <td>9.21</td> </tr> <tr> <td>April</td> <td>6.40</td> <td>7.84</td> </tr> </tbody> </table>	Month	Air Buluh Estate (HSD Oil / ton FFB)	Malin Deman Estate (HSD Oil / ton FFB)	January	6.30	11.37	February	6.20	10.01	March	6.58	9.21	April	6.40	7.84	Comply
Month	Air Buluh Estate (HSD Oil / ton FFB)	Malin Deman Estate (HSD Oil / ton FFB)																
January	6.30	11.37																
February	6.20	10.01																
March	6.58	9.21																
April	6.40	7.84																

May	6.04	10.53
June	8.91	8.66
July	6.43	7.73
August	5.96	8.63
September	5.97	8.44
October	9.17	9.56

Bunga Tanjung Estate and Air Bikuk Estate in 2019, such as:

Month	Bunga Tanjung Estate (HSD Oil / ton FFB)	Air Bikuk Estate (HSD Oil / ton FFB)
January	6.18	6.48
February	7.94	6.61
March	7.23	6.29
April	7.38	5.65
May	10.22	6.19
June	5.71	5.46
July	5.83	6.45
August	6.82	6.34
September	6.15	5.93
October	6.24	

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	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.	Company has procedure Calculation and Mitigation of Green House Gas, whereby provide guidance to register source of emissions as a result of company operation, mointor and reduce the use of materials emitting GHG emission, calculate GHG emission from company operational activities. Source of emission inventory from estate operation: use of inorganic fertilizer Urea (N), Dolomite (CaO), MOP (K ₂ O), Rock Phospate (P ₂ O ₅), use of pesticide, use HSD fuel. Handling emission from steam boiler in Mukomuko POM No.AMPOM-WI/PROD/009E, consist of guideline for minimizing soot pollution/particulate: ensure fibre and shell feed; minimize shell to prevent black smoke;	Comply
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		<p>setting air damper for ignition, avoid excess air; dumping grate on regular basis, to minimize unburn fuel; shoot blowing every 4 hours to clean heat exchanger pipes; ensure dust collector operating in good manner; monitor boiler exhaust emission through smoke density meter; monitor boiler emission every 6 months by independent laboratory; record any problem.</p> <p>Handling emission from engine generator No.AMPOM-WI/PROD/010D, consist of guideline for minimizing emission: ensure the generator operating at permitted load (80% from design); replace air filter element (every 1,250 hours), replace fuel filter (every 500 hours), replace oil filter (250 hours) – on regular basis; replace engine lubricant every 250 hours; should black smoke sighted – check engine load; should the black smoke sighted – check injection pump; monitor engine emission every 6 months by independent laboratory; GHG reduction plan identified under "Rencana Pengurangan Emisi Gas Rumah Kaca (GHG Emission)":</p>																															
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Fertilizer application	Effective fertilizer application as per recommendation	<ul style="list-style-type: none"> - Leaf sampling analysis for accurate fertilizer recommendation - Implement SOP fertilizer application 	
	No fertilizer application in rainy season		
	No fertilizer application on river buffer zone/riparian area		
	Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application		
Upkeep and harvesting			
Use of fossil fuel for transportation (FFB, fertilizer, manpower)	Maintenance the vehicle on regular basis	<ul style="list-style-type: none"> - Vehicle maintenance record - Planting record - Evaluation on vehicle use (incl. fuel efficiency) 	
	Planting trees		
	Transportation arrangement (effective and efficient)		
	Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel		
Fertilizer and pesticide application	Effective fertilizer application as per recommendation	<ul style="list-style-type: none"> - Leaf sampling analysis for accurate fertilizer recommendation - Implement SOP fertilizer application - Utilize recommended pesticide 	
	No fertilizer and pesticide application in rainy season		
	No fertilizer and pesticide application on river buffer zone/riparian area		
	Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer and pesticide application		
Housing			
Use of fossil fuel for electric	Maintenance the machinery (genset) on regular basis	<ul style="list-style-type: none"> - Vehicle maintenance record - Planting record 	

		generation	Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel; and electricity efficiency Emission monitoring on regular basis	- Evaluation on Genset's fuel efficiency
		Waste decomposition in landfill	Waste collection to landfill	Landfill in each estate
		FFB processing in palm oil mill		
		Waste management	Using methane capture and utilize the biogas Utilize EFB as boiler fuel	- Methane capture and biogas plant in POM - Install EFB shredder in POM
		Use of fossil fuel for transportation (FFB, CPO, PK, EFB)	Maintenance the vehicle on regular basis Socialization to all level of worker on GHG mitigation plan related to electricity efficiency	- Vehicle maintenance record - Evaluation on electricity efficiency
		Operation of POM's machinery including boiler	Maintenance the POM's machinery on regular basis Socialization to all level of worker on GHG mitigation plan related to emission Emission monitoring on regular basis	- Machinery maintenance record - Evaluation on boiler's efficiency - Emission monitoring report
		<p>Company have prepared the PalmGHG calculator, based on database period October 2018-September 2019. The result of calculation have been attached as appendix. The company have report the GHG calculator to RSPO.</p> <p>Tanah Rekah Estate: Training on fertilizer application for 26 fertilizer applicators in Division V, Tanah Rekah Estate, dated 22 October 2019. EFB application record, to date October 2019 shown 2,108 tons EFB applied for 182.80 Ha in Division V, Tanah Rekah Estate.</p>		

		Planting "Mimba" (<i>Azadirachta indica</i> A. Juss) 78 trees from nursery to the field, dated 16 October 2019.	
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	<p>Bunga Tanjung Estate: There is no new development of after 2014 in Bunga Tanjung Estate.</p> <p>In PT. Mukomuko Agro Sejahtera, From the "Hectare Statement", recording the land preparation and planting realization, no planting on primary forest and/or peat area for PT. Mukomuko Agro Sejahtera – Air Manjuntio Estate. HCV area and the vegetation are maintained.</p> <p>PT. Agro Muko has provide complete information on planting plan for <i>Kebun Masyarakat Desa/KMD</i> – including avoiding area with high carbon stock for development. Based on interview with KMD committees and document review upon "Planting Approval" document, KMD have agreed on the approach. Based on soil survey, no peat soil identified in the smallholder land.</p> <p>From the HCV report, carbon stock assessment stated area that contain high carbon stock was sets aside. No supply base to Bunga Tanjung POM categorized as HCS area.</p> <p>KMD Pasar Bantal: The smallholder planted oil palm in 2001/2002.</p> <p>KMD Nelan Indah: The smallholder planted oil palm in 2014. The HCV have been checked internally by PT. Agro Muko. The assessment stated in the proposed area was ex-oil palm plantation, but due to bad crop, being replanted using seedling from company.</p>	Comply
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.	The company has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality, noise level, etc. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government. In Mukomuko POM, all emission are monitored.	Comply
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	Based on field visit and document review there is no new planting or replanting preparation carried out by burning.	Comply

	burning.		
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.	<p>The company has established fire prevention committee as reported to the Agriculture Agency of Mukomuko Regency, based on report No.26/RMO-AM/ENC/M/XI/2019 dated 6 Nov 2019. The committee is align with Emergency Response Team. In Bunga Tanjung Estate, the committee consist of:</p> <ol style="list-style-type: none"> 1. Chairman: Reno Septyono; 2. Secretary: Greace Anasthasya; 3. PIC for prevention: T. Sihite; 4. PIC for control: Arifin; 5. PIC for Logistic: Edi Sulistiono; 6. Main Team consist of 2 team; 7. Support Team consist of 2 team; each team consist of 5 personnel; 8. Helper Team consist of 2; team each team consist of 5 personnel. <p>In Air Bikuk Estate, the committee consist of:</p> <ol style="list-style-type: none"> 1. Chairman: SA. Manurung; 2. Secretary: Nofirizal; 3. PIC for prevention: Juharman; 4. PIC for control: Rudi Hartono; 5. PIC for Logistic: Gustiapudin; 6. Main Team consist of 2 team; 7. Support Team consist of 2 team; each team consist of 5 personnel; 8. Helper Team consist of 2; team each team consist of 5 personnel. 	Comply
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	As evidence that prevention and control measures are engaged with adjacent stakeholder, helper team are farmer from surrounding village, for examples in Bunga Tanjung Estate, helper team are coming from Brangan Mulya Village and Bunga Tanjung Village. In Air Bikuk Estate, helper team are coming from Air Bikuk Village and Lubuk Bento Village. Document of Infrastructure readiness for fire prevention are reported to the local government, Agriculture Agency of Mukomuko Regency.	Comply

Criteria 7.12:

Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

PROCEDURAL NOTE for 7.12:

The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon

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<p>Stock Approach (HCSA) Toolkit in the revised standard.</p> <p>The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems. High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards.</p> <p>Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs). The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.</p>			
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	<p>The HCV assessment carried out in 2010 by “Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation – YASBI Foundation)” using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. All HCV mapped and identified. There is no land clearing after November 2005 that is not preceded with review against the HCV Assessment.</p>	<p>Comply</p>
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows: 7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of</p>	<p>The HCV assessment carried out in 2010 by “Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation – YASBI Foundation)” using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. All HCV mapped and identified. The assessment team comprise of Ir. Purwo Susanto (lead assessor – RSPO approved HCV assessor); Dr. Kunkun Jaka Gurmaya (biodiversity – RSPO approved HCV assessor); Neny Indrayana Shut. MT (ecology – RSPO approved HCV assessor); Ir. Hery Prasetyo (social impact); M. Setyawan N (GIS); Amirul Ikhsan (GIS); Asep Ridwan Anaribowo (biodiversity); Abdillah Luhur Nuratmaja Ssi (biodiversity); Arief Wahyu Candra Susilo, Ssos. (social-cultural); Sofyan Ansori (anthropology).</p>	<p>Comply</p>

	<p>those plantations remains valid.</p>	<p>The HCV assessment report concluded that PT. Agro Muko has already set aside conservation areas of a total 2,304.9 Ha consisting of natural vegetation in between palm planting to provide habitat and corridors for wildlife.</p> <p>In addition, PT. Agro Muko conducted <i>penataan</i> HCV area by PT. Perencana Karya Hijau Konsultan, in 2018. The HCV Assessment team comprise of Sigit B Setyanto (Team Leader, ALS); Riswan (Remote sensing and environmental service, ALS provisional); Wibowo A Djatmiko (Conservation and biodiversity); Harry Kurniawan (GIS and mapping); Kodri Sitompul (Survey and GIS assistant).</p>	
	<p>7.12.2 b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>Air Bikuk Estate: There is no new land clearing after 15 November 2018.</p> <p>Bunga Tanjung Estate: There is no new land clearing after 15 November 2018.</p>	
<p>PROCEDURAL NOTE for 7.12.2: For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p>			
<p>7.12.3</p>	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>PT. Agro Muko – Bunga Tanjung POM and its supply base located in Bengkulu Province, Sumatera Island, Indonesia. Based on document “RSPO No Deforestation Consultancy: High Forest Cover Countries – Consultancy report on definitions and recommendations to the RSPO, June 2018” by Proforest;</p> <ul style="list-style-type: none"> - Indonesia fall into “High Remaining Forest, High Rate of Deforestation/HFHD”. Refer to “Section 4.6 Statistics on potential high forest cover countries” – Indonesia categorized to have 53% forest cover; 15% Intact Forest Landscape; 54.2% forest (national source); 5.4% Oil Palm Land Area; 0.7%/year deforestation rate (FAO); Increasing Deforestation Trend; 0.9%/year deforestation rate (national source); constant deforestation rate/trend. <p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera’s estate located relative to “Kerinci Seblat” National Park:</p> <ul style="list-style-type: none"> - Sei Kiang Estate estate’s boundary is “Hutan Produksi Tetap”, and adjacent to “Kerinci Seblat” National Park (<20 km); 	<p>Comply</p>

		<p>PT. Agro Muko's NDPE policy: General Information: New Development Area and Replanting No.OPM-03-00/02-10-2017, dated 20 November 2017. Stipulates "land clearing and replanting on peat land will be influenced by the type and depth of peat". General Information: Survey and Mapping No.OPM-03-01/02-10-2017, dated 20 November 2017. Stipulates company views on peat: "Especially for extensive peat soil, the distribution, level of maturity and depth of peat must be explained"; company view on conservation area: "the presence or absence of national park, production forest and limited production forest. Whether or not there is riparian reserves and conservation area". SOP Planting Plant – Approval No.ESD-01-02/11-03-2019 dated 27 March 2019. The planting approval process will review information on planting material (incl. seed certificate), soil information (soil type, peat depth map, drainability assessment, water management plan, drainage and Watergate map), topographic and slope information, presence of conservation area, OHS requirement and fire risk. Based on HCV assessment document by YASBI, 2018 – there is no HCV area located on local community's land, and/or local communities with legal or customary rights. Company demonstrated recognition of legal and customary lands based on participatory land use planning by preparing scheme smallholder plantation on clean-and-clear land. The local community proposed their plantation to become oil palm plantation (replanting).</p>	
<p>PROCEDURAL NOTE for 7.12.3: There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p>			
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 plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains</p>	<p>PT. Agro Muko prepared HCV management plan: "Program Kegiatan NKT PT. Agro Muko 2019" - Patrol/controlling conservation area – every month; - Camera trap install – every month; - Propagating tree seedling (for restoration) – on February, May, August, November 2019; - Nurture tree seedling (for restoration) – every month, by ranger; - Planting tree seedling (for restoration) – on February, May, August, November 2019, by ranger; - Maintain and listing/inventory the tree in restoration – every end of month, by ranger; - Inventory the signboard of conservation area – every month, by ranger, report into monitoring form; - Controlling Mucuna and invasive species – every other month, by ranger, report into monitoring form;</p>	Comply

	<p>monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<ul style="list-style-type: none"> - Monitoring RTE flora and fauna – every month, by ranger, report into monitoring form; - Prepare/replace new signboard – on April & September 2019; - Socialization of conservation area to worker – on February and July 2019, by ranger; - Socialization of conservation area to stakeholder/surrounding community – on March, June and October 2019, by ranger; - Management meeting with ENC team on every month <p>Result: Camera trap period 9 February – 6 March 2019: pig-tailed macaque (<i>Macaca nemestrina</i>), hog (<i>Sus scrofa</i>), gibbon (<i>Hylobates syndactylus</i>), long-tailed macaque (<i>Macaca fascicularis</i>). Planting tree in HCV area (restoration) Bahan river riparian: "Ketapang" (<i>Terminalia catappa</i>) 7 trees, "Kayu bawang" (<i>Scorodocarpus berneensis</i>) 3 trees, "Kayu Afrika" (<i>Maesopsis eminii</i>) 2 trees.</p>	
<p>7.12.5</p>	<p>Where rights of local communities have been identified in HCV areas, 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>Bunga Tanjung Estate: There is no HCV area located in local community's land.</p> <p>Air Bikuk Estate: There is no HCV area located in local community's land.</p>	<p>Comply</p>
<p>7.12.6</p>	<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</p>	<p>Bunga Tanjung Estate: Socialization for HCV (the HCV1, HCV2, HCV4 present in the Estate, how to maintain and conserve, type of RTE species present in Estate, prohibit hunting animal, prohibit poison fish, no capturing for pet) in Bunga Tanjung Estate dated 4 March 2019, attended by 29 employees: kindergarten teachers, carpenters, warehouse keeper, heavy machinery operators, genset operators, nurses, truck drivers, mechanics. Dated 2 March 2019, attended by 23 employees in Division 1: harvesters, mandor, checker. Socialization for HCV in Bunga Tanjung Estate dated 2 March 2019, attended by 30 employees: 1 mandor, 2 checker, 18 harvesters, 5 manure applicators, 2 gardeners.</p>	<p>Comply</p>

	<p>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>Air Bikuk Estate: Socialization for HCV (the HCV1, HCV2, HCV4 present in the Estate, how to maintain and conserve, type of RTE species present in Estate, prohibit hunting animal, prohibit poison fish, no capturing for pet) in Air Bikuk Estate dated 15 March 2019, attended by 27 harvesters, 2 drivers, 3 sprayers, 3 manure applicators, 6 truck helper. Socialization HCV and RTE Species for Air Bikuk village dated 15 June 2019, attended by 10 people, including KMD committee.</p>	
<p>7.12.7</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>Laporan Pemantauan Jenis Tumbuhan dan Satwa di Area Konservasi PT. Agro Muko dan PT. Mukomuko Agro Sejahtera 2018. The HCV management plan consist of patrol to HCV area (seek for indication of encroachment, tree felling, burning, vandalism, erosion, animal hunting, sign board condition), <i>Mucuna</i> control, and camera trap installation (monitoring of wildlife). The report evaluation: the monitoring and management of HCV area is good. The HCV area controlled, employee understanding on RTE species protection is good. The report conclusion: based on monitoring, RTE species (flora and fauna) is still present. The HCV area still functioning as habitat for wildlife. Audit team made visit to HCV1 and HCV4, near block 05NN01 – buffer zone Sungai Bantal Kanan. The condition is good, vegetation is good.</p> <p>RTE species identified: Aves: Elang Tikus (<i>Elanus caeruleus</i> – IUCN LC, CITES App II), Elang kelelawar (<i>Macheiramphus alcinus</i> - IUCN LC, CITES App II), Elang hitam (<i>Ictinaeus malayensis</i> – IUCN LC, CITES App II), Rangkong Badak (<i>Buceros rhinoceros</i> – IUCN NT, CITES App II), Elang Ular Bido (<i>Spilorna cheela</i> – IUCN LC, CITES App II), Alap-alap capung (<i>Microhelax fringillarius</i> - IUCN LC, CITES App II), Pelatuk Merah (<i>Chrysophlegma minicaeum</i> – IUCN LC), Raja Udang Punggung Merah (<i>Ceyx rufidorsa</i> – IUCN LC); Primates: Siamang (<i>Hylobates syndactylus</i> – IUCN EN, CITES App II), Monyet ekor panjang (<i>Macaca fascicularis</i> – CITES App II), Lutung Simpai (<i>Presbytis melalaphos</i> – IUCN EN, CITES App II), Lutung Kelabu (<i>Presbytis cristatus</i> – CITES II). Plant: Waru Gunung (<i>Hibiscus macrophyllus</i> – IUCN VU), Kantong Semar (<i>Nepenthes sp.</i> – CITES II), Anggrek Tanah (<i>Curculigo vilosa</i> – Protected in Indonesia), Manggeris (<i>Koompassia excelsa</i> – IUCN LR), Resak (<i>Vatica spp</i> – IUCN LC), Rengas (<i>Glutha renghas</i> – Protected in Indonesia).</p>	<p>Comply</p>

		<p>Bunga Tanjung Estate: "Laporan Mingguan Ranger Bunga Tanjung Estate", date 29 July 2019 patrol visit to block 98M02a; date 30 July 2019 patrol visit to block 98L01a. RTE Species captured from camera trap in Bunga Tanjung Estate period 3-21 July 2019: Sempidan biru (<i>Lophura ignita</i> – IUCN Near Threatened), <i>Kucing kuwuk</i> (<i>Prionailurus bengalensis</i> – CITES App II, protected, PP RI), Pig-tailed Macaque (<i>Macaca nemestrina</i> – IUCN Vu, CITES App II). RTE Species captured from camera trap in Bunga Tanjung Estate period August 2019: Pig-tailed Macaque (<i>Macaca nemestrina</i> – IUCN Vu, CITES App II).</p> <p>Air Bikuk Estate: "Laporan Mingguan Ranger Air Bikuk Estate", date 2-6 January 2019 patrol visit to Division I-III; condition no indication of encroachment, no tree felling, no burning. "Laporan Mingguan Ranger Air Bikuk Estate", date 19 February 2019 patrol visit to block 19G01 and 19J01; condition no indication of burning.</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 Procedure (RaCP) applies.</p>	<p>Bunga Tanjung Estate: The oil palm in Bunga Tanjung Estate planted between 1998 and 2006.</p> <table border="1" data-bbox="685 911 1061 1182"> <thead> <tr> <th>Planting Year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>1998</td> <td>646.81</td> </tr> <tr> <td>1999</td> <td>223.43</td> </tr> <tr> <td>2000</td> <td>357.21</td> </tr> <tr> <td>2001</td> <td>193.68</td> </tr> <tr> <td>2005</td> <td>117.97</td> </tr> <tr> <td>2006</td> <td>569.41</td> </tr> <tr> <td>Total</td> <td>2,312.19</td> </tr> </tbody> </table> <p>Air Bikuk Estate: The oil palm plantation in Air Bikuk Estate initially planted between 1991 and 1998.</p> <table border="1" data-bbox="685 1278 1285 1378"> <thead> <tr> <th>Planting Year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>1998</td> <td>604.62</td> </tr> <tr> <td>2015 (from OP 1991)</td> <td>65.54</td> </tr> </tbody> </table>	Planting Year	Hectarage	1998	646.81	1999	223.43	2000	357.21	2001	193.68	2005	117.97	2006	569.41	Total	2,312.19	Planting Year	Hectarage	1998	604.62	2015 (from OP 1991)	65.54	Comply
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		2017 (from OP 1997)	230.22		
		2018 (from OP 1997)	174.24		
		2019 (from OP 1998 of 83.22 Ha and OP 1998 of 53.81 Ha)	137.03		
		Total			

Appendix B: Approved Time Bound Plan

Name of company	Name of Mill	Locatiom	Supply Base	Time Bound Plan	Target Year for RSPO
PT. Agro Muko	Muko Muko Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko estate, Sei Betung estate, Tanah Rekah estate, Talang Petai estate, Sei Kiang estate and KMD	2011	Certified
	Bunga Tanjung Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung estate, Air Bikuk estate, Air Buluh estate and KMD	2011	Certified
			PT. Mukomuko Agro Sejahtera: - Air Manjuntio estate - Malin Deman estate	2014	Certified
			Ex. PT. Asri Rimba Wirabhakti (acquisition in 2018)	2020	A new NPP will be submitted waiting for HCV, LUC review
PT. Tolan Tiga	Bukit Maradja Mill	Simalungun Regency, North Sumatera, Indonesia	- Bukit Maradja Estate (PT. Eastern Sumatra Indonesia) - Kerasaan Estate (PT. Kerasaan Indonesia) - PT. Timbang Deli Indonesia	2010	Certified May 2010
				2018	Certified in 2018 as supply base of Bukit Maradja POM, PT Eastern Sumatra Indonesia
	Perlabian Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian estate and Tolan estate.	2010	Certified May 2010
PT. Umbul Mas Wisesa	Umbul Mas Wisesa Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South estate, UMW North estate and Toton Usaha Mandiri estate	2014	Certified in March 2015
PT. Agro Kati Lama		Musirawas Regency, South Sumatera, Indonesia		2021	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
PT. Agro Rawas Ulu		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
PT. Agro Muara Rupit		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
Hargy Oil Palm Limited (HOPL)	Hargy Mill	East of Bialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo Mill	50 Kms East of Bialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengen Estate	2009	Certified in April 2009
	Barema Mill	30 km East of Bialla, West New Britain Province, PNG	Barema Estate	2014	RSPO Certified in April 2014
PT. Dendy Maker Indah Lestari	Dendy Maker Mill	Musirawas Utara Regency, South Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	Acquired on 1 August 2017. RSPO certified in 2015.

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **October 2018 – September 2019** for **Bunga Tanjung POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **October 2018 – September 2019** for **Bunga Tanjung POM** and supply base are as following:

Emission per product	tCO₂e/tProduct	Extraction	%
CPO	0.15	OER	22.87
PKO	0.15	KER	5.15

Production	t/yr	Land Use	Ha
FFB Process	122,669.100	OP Planted Area	6,713.10
CPO Produced	28,571,888	OP Planted on peat	0
PKO Produced	6,132.811	Conservation (forested)	1,018.74
		Conservation (non-forested)	0

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	99,635.85	0.45	11,333.79	1.15	6,748.08	1.44	117,717.72	3.04
CO ₂ Emission from fertilizer	12,563.83	0.06	1,184.95	0.12	266.90	0.06	14,015.68	0.24
NO ₂ Emission	18,105.30	0.08	736.64	0.07	177.49	0.04	19,019.43	0.19
Fuel Consumption	3,922.93	0.02	0.32	0	0	0	3,923.25	0.02
Peat Oxidation	61,601.36	0.28	0	0	0	0	61,601.36	0.28
Sink								
Crop Sequestration	-88,666.76	-0.40	-9,142.95	-0.93	-5,443.66	-1.16	103,253.37	-2.49
Conservation Sequestration	-10,797.2	-0.05	-1,318.83	-0.13	-484.18	-0.10	-12,600.21	-0.28
Total	96,365.31	0.44	2,793.92	0.28	1,264.63	0.27	100,423.9	0.99

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO₂e	tCO₂e/tFFB
Emission		
POME	21,141.73	0.2
Fuel Consumption	761.06	0
Grid Electricity Utilization	0	0
Credit		

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Export of Grid Electricity	-2,241.15	-0.13
Sales of PKS	0	0
Sales of EFB	-8,913.59	0
Total	10,748.05	0.07

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	18438.53
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*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 D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1.	November 2018	9,864.21	-	9,864.21
2.	December 2018	10,587.59	-	10,587.59
3.	January 2019	9,383.84	-	9,383.84
4.	February 2019	8,379.16	-	8,379.16
5.	March 2019	9,806.78	-	9,806.78
6.	April 2019	8,271.86	-	8,271.86
7.	May 2019	8,165.03	-	8,165.03
8.	June 2019	8,151.50	-	8,151.50
9.	July 2019	13,480.76	-	13,480.76
10.	August 2019	11,902.19	-	11,902.19
11.	September 2019	12,154.38	-	12,154.38
12.	October 2019	12,584.19	-	12,584.19
Total		122,731,49		122,731,49

Note:

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1.	November 2018	2,296.39	534.40
2.	December 2018	2,464.79	544.56
3.	January 2019	2,184.56	487.69
4.	February 2019	1,950.67	402.48
5.	March 2019	2,283.02	466.93
6.	April 2019	1,925.69	409.03
7.	May 2019	1,900.82	386.02
8.	June 2019	1,897.67	389.76
9.	July 2019	3,138.32	662.11
10.	August 2019	2,770.83	601.94
11.	September 2019	2,829.54	607.81
12.	October 2019	2,929.60	640.08
Total		28,571.89	6,132.81

Note:

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1.	PT. Usaha Inti Padang	TR-6a08de81-f082		200
2.	PT. Usaha Inti Padang	TR-de137170-79b3		250
3.	Cargill B.V. Refined Oils Europe	TR-2e18fef2-235a	1,999.98	
4.	Cargill B.V. Refined Oils Europe	TR-f207335d-0e01	1500	
5.	Cargill B.V. Refined Oils Europe	TR-fdb2a8c1-ee63	2000	
6.	Cargill B.V. Refined Oils Europe	TR-5fb9776e-aeb4	1,499.84	

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7.	PT. Wira Inno Mas	TR-2d0aeeca-7ebf	2,999.91	
8.	PT. Wira Inno Mas	TR-9b1f6c7c-94e8	2,999.99	
9.	PT. Wira Inno Mas	TR-df272549-e93e	2,999.81	
10.	PT. Usaha Inti Padang	TR-14cb0718-d0c5		255.93
11.	PT. Usaha Inti Padang	TR-ad89d179-8257		44.07
12.	PT. Wira Inno Mas	TR-df6c7fe4-a017		300
13.	PT. Wira Inno Mas	TR-502fc64f-641a	2,999.77	
14.	PT. Wira Inno Mas	TR-02415da0-6b79	2,999.96	
Total			21,999.26	1,050

Note:

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)

No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1.	0	0	0	0

Note:

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)

No.	Month- Year	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Nov-18	PT Usaha Inti Padang		208.34
2	Nov-18	PT Wira Inno Mas		17.08
3	Dec-18	PT Wilmar Nabati Indonesia	1495.96	
4	Dec-18	PT Dendy Marker Indah Lestari	20	
5	Dec-18	PT Usaha Inti Padang		40.72
6	Dec-18	PT Wira Inno Mas		282.92
7	Jan-18	PT Wilmar Nabati Indonesia	4004.04	
8	Jan-18	PT Usaha Inti Padang		405.29
9	Feb-19	PT Wilmar Nabati Indonesia	2000	
10	Feb-19	PT Dendy Marker Indah Lestari	19.8	
11	Feb-19	PT Usaha Inti Padang		319.64
12	Feb-19	PT Wira Inno Mas		261.58
13	Mar-19	PT Usaha Inti Padang		38.42
14	Mar-19	PT Wira Inno Mas		237.84
15	Apr-19	PT Usaha Inti Padang		268.09
16	May-19	PT Usaha Inti Padang		344.07
17	Jun-19	PT Usaha Inti Padang		84.83
18	Jul-19	PT Usaha Inti Padang		403.98
19	Jul-19	PT Wira Inno Mas		300
20	Aug-19	PT Wira Inno Mas		600
21	Sep-19	PT Usaha Inti Padang		311.19
22	Oct-19	PT Usaha Inti Padang		344.13
23	Oct-19	PT Wira Inno Mas		300
Total			7,539.8	4,768.12

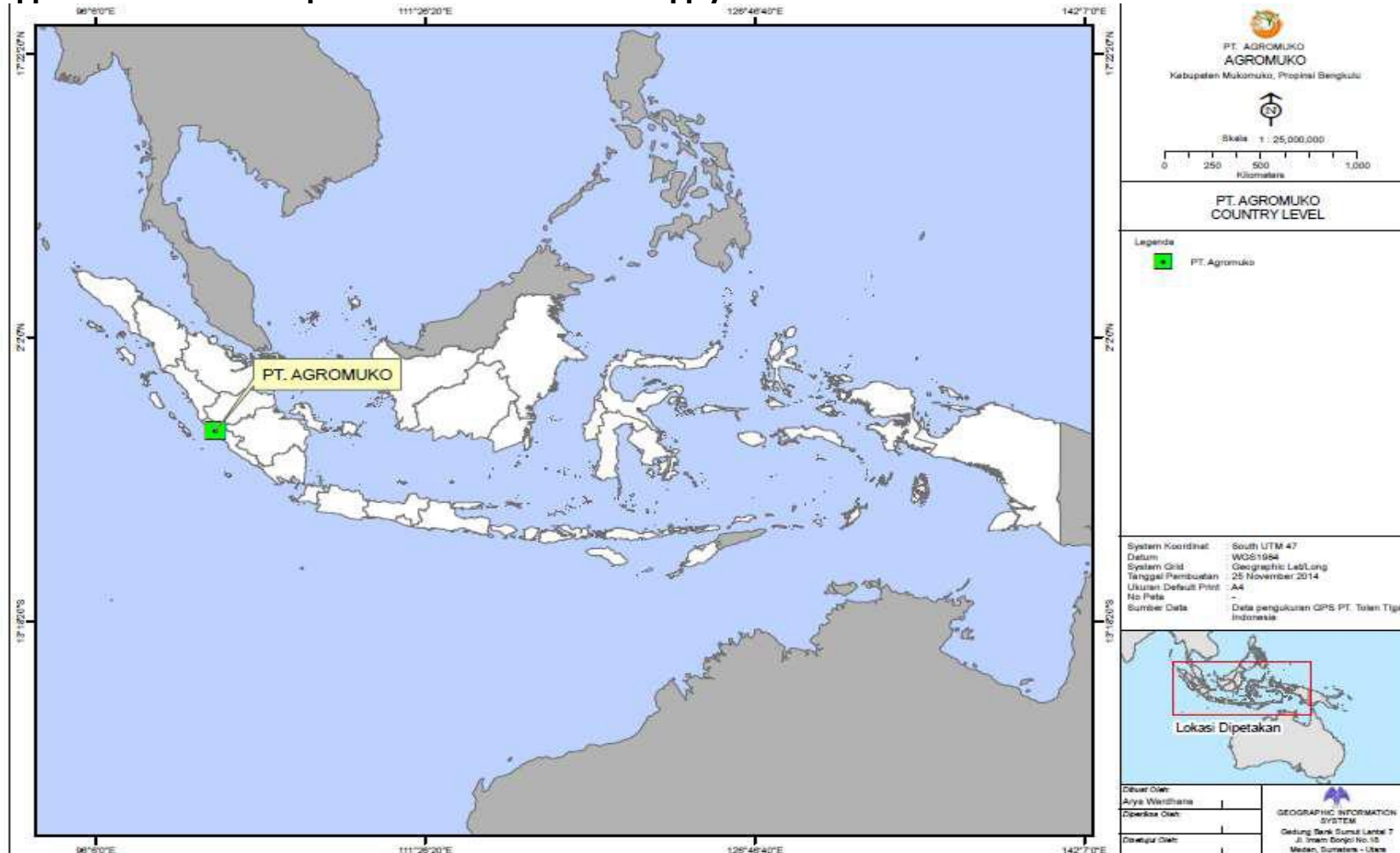
Note:

- Transaction of CPO and PK sold as conventional in November 2018 to December 2019 is stock from previous license. CPO is 1,515.96 MT and PK is 225.42 MT
- Sold from current license is transaction since January 2019 to October 2019. CPO is 6,023.8 MT and PK is 4,219.06 MT

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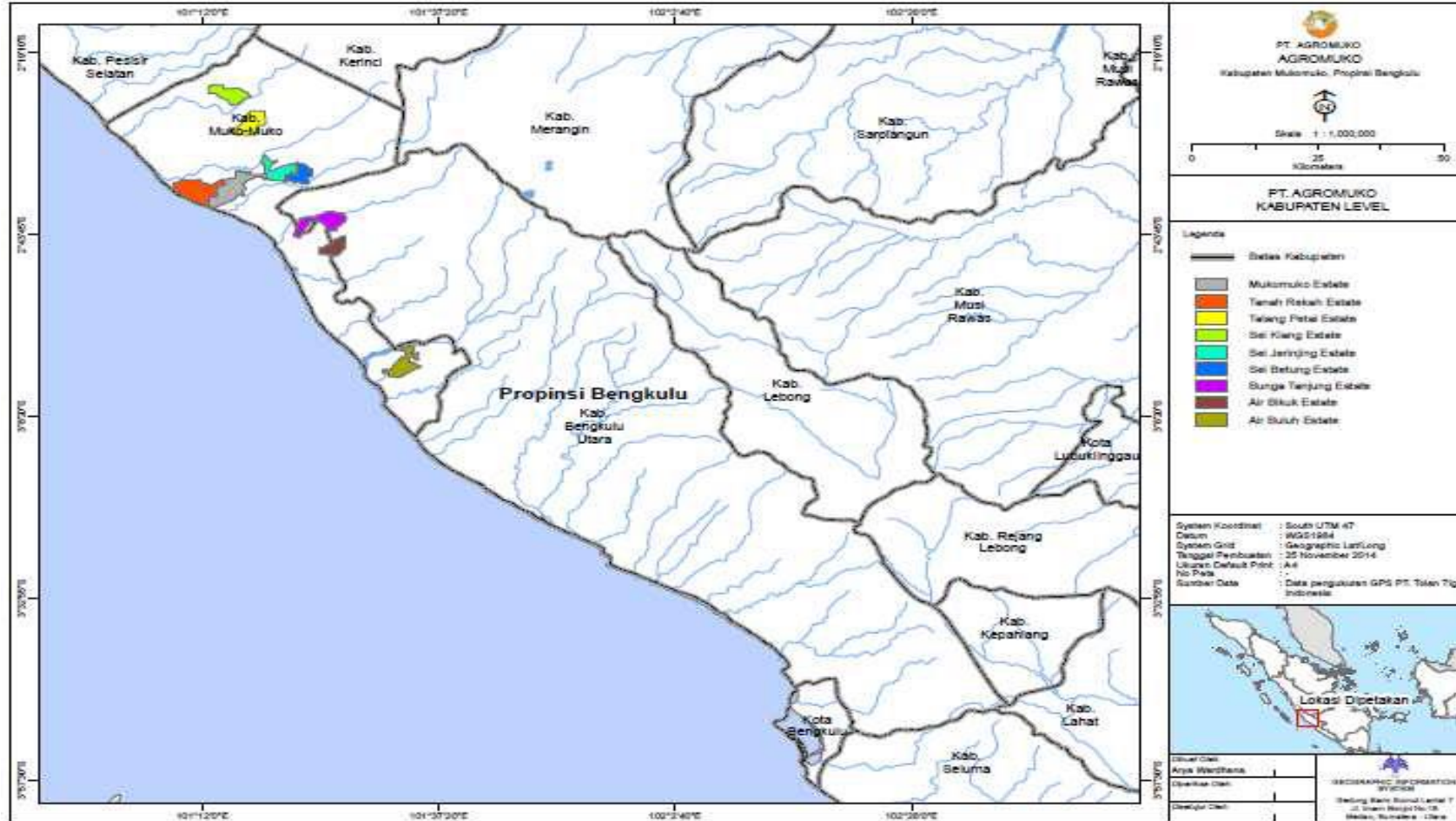
E. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		
Note:			

Appendix F: Location Map of Certification Unit and Supply bases



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Appendix G: Estate Field Map



Appendix G: List of Smallholder Sampled

1. KMD Tanjung Harapan
2. KMD Bukit Harapan
3. KMD Mundam Marap
4. KMD Air Bikuk
5. KMD Air Berau
6. KMD Pondok Sugu
7. KMD Pasar Bantal
8. KMD Nelan Indah

Appendix I: 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
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure