

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**☐ Initial Assessment☒ Annual Surveillance Assessment (1)☐ Recertification Assessment (Choose an item.)☐ Extension of Scope

| |
|---|
| Client Company Name / Parent Company: Golden Agri-Resources Ltd |
| Client Company / Parent Company Address: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535 |
| Certification Unit: PT Paramitra Internusa Pratama – Belian Mill Location of Certification Unit: Desa Nanga Seberuang, Kecamatan Semitau, Kabupaten Kapuas Hulu, Provinsi Kalimantan Barat, 78771 Indonesia |
| Date of Final Report: 03/12/2024 |

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Section 1: Scope of the Assessment

| 1. Company Details | | | |
|---|---|--------------------------|--|
| Parent Company | Golden Agri-Resources Ltd | | |
| RSPO Membership Number | 1-0096-11-000-00 | Membership Approval Date | 30 January 2005 |
| Address | RSPO Registered Company: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535 Liaison Office: Sinar Mas Land Plaza, Tower II, 30 th Floor, JL. MH Thamrin No.51, Jakarta 10350, Indonesia | | |
| Palm Oil Mill / Group Manager / Estate (Certification Unit) | PT Paramitra Internusa Pratama – Belian Mill | | |
| Location / Address | Desa Nanga Seberuang, Kecamatan Semitau, Kabupaten Kapuas Hulu, Provinsi Kalimantan Barat, 78771 Indonesia | | |
| Website | http://www.goldenagri.com.sg | | |
| Management Representative | Yahya Mustakim | E-mail | yahya.mustakim@sinarmas-agri.com |
| Telephone | +62-21 5033 8899 | Facsimile | +62-21 5033 8899 |

| 2. Certification Information | | | |
|--|--|---|--|
| Certificate Number | RSPO 644391 | Certificate Start Date | 28/11/2023 |
| Date of First Certification | 28/11/2023 | Certificate Expiry Date | 27/11/2028 |
| Scope of Certification | Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK). | | |
| Visit Objectives | <ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. | | |
| Assessment Cycle | <input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension | | |
| Applicable Standards / Normative Reference | RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 of the RSPO P&C 2018 | | |
| Supply Chain Module | <input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance | Mill Capacity | 80 tons FFB/hour |
| ISH Certification Phase | <input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable | | |
| Is this a Remote Audit or On-site Audit | <input checked="" type="checkbox"/> On-site Audit (Option AI) | <input type="checkbox"/> On-site Audit (Option AII) | <input type="checkbox"/> Remote Audit (Option B) |

| 3. Other Certifications | | | |
|-------------------------|-------------|-----------------------|-------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| SPO.23078.TSI | ISPO | TSI | 25/11/2028 |

| 4. Location(s) of Mill & Supply Bases | | | |
|---|--|-----------------|-------------------|
| Name (Mill / Supply Base / Group Manager / Smallholders) | Location | GPS Coordinates | |
| | | Latitude | Longitude |
| Belian Mill | Desa Nanga Seberuang Kecamatan Semitau Kab Kapuas Hulu | 0° 29' 14.87" N | 111° 50' 40.93" E |
| Belian Estate | Desa Nanga Seberuang Kecamatan Semitau Kab Kapuas Hulu | 0° 29' 05.85" N | 111° 50' 58.31" E |
| Tengkawang Estate | Desa Tua Abang Kecamatan Semitau Kabupaten Kapuas Hulu | 0° 32' 10.31" N | 111° 47' 54.69" E |
| Note: | | | |

| 5. Description of Supply Base | | | | | |
|---|--|-----------------|-----------------------------------|--------------------|-----------------|
| New Planting Development | <input checked="" type="checkbox"/> No | | <input type="checkbox"/> Yes | | |
| Estate / Smallholders | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Belian Estate | 1,887.37 | 474.60 * | 1,754.91 | 4,116.88 *** | 45.84 |
| Tengkawang Estate | 3,158.30 | 1,774.95 ** | 4,116.50 | 9,049.75 | 34.90 |
| Total | 5,045.67 **** | 2,249.55 | 5,871.41 | 13,166.63 | 38.32 |
| Note: *Total HCV in BLNE 540.18 Ha (HCV inside planted area 65.58 Ha) **Total HCV in TNKE 1,913.43 Ha (HCV inside planted area 138.48 Ha) ***Total land title/HGU of BLNE 4,139.32 Ha using TM3 projection, whilst LUCA RSPO using UTM projection (4,116.88 Ha). There was a discrepancy based on projection method. ****Based on memorandum Regional Controller Region Semitau No. 025/RC/SMT/X/2022 dated 1 November 2022 related to transporting certified/uncertified FFB mechanism to Belian Mill. List of areas certified and non-certified areas along with map of Belian and Tengkawang Estate attached. Based on updated database, total planted area 5,045.67 Ha; certified area 1,725.78 Ha; non-certified area 3,319.89 Ha (self-downgraded certified areas for simplify supply chain implementation). | | | | | |

| 6. Plantings & Cycle | | | | | | |
|-----------------------|------------------|--------|---------|-----|--------|----------|
| Estate / Smallholders | Age (Years) - ha | | | | Mature | Immature |
| | 0 - 3 | 4 - 14 | 15 - 25 | >25 | | |

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| | | | | | | |
|-------------------|----------|-----------------|-----------------|----------|------------------|----------|
| Belian Estate | - | 823,48 | 1,063.89 | - | 1,887.37 | - |
| Tengkawang Estate | - | 1,448.47 | 1,709.83 | - | 3,158.30 | - |
| Total (ha) | - | 2,271.95 | 2,773.72 | - | 5,045.67* | - |

Note: Only Mature area is considered as production area

*Based on memorandum Regional Controller Region Semitau No. 025/RC/SMT/X/2022 dated 1 November 2022 related to transporting certified/uncertified FFB mechanism to Belian Mill. List of areas certified and non-certified areas along with map of Belian and Tengkawang Estate attached. Based on updated database, total planted area 5,045.67 Ha; certified area 1,725.78 Ha; non-certified area 3,319.89 Ha (self-downgraded certified areas for simplify supply chain implementation).

7. Summary of Certified Tonnage of FFB (Own Certified Scope)

| Estate / Smallholders | Tonnage (MT) / year | | | |
|--------------------------|--|---------------------------------|---|-----------------------------------|
| | Estimated last year (Nov 2023 – Oct 2024) | Actual (Nov 2023 – Aug 2024) | | Forecast (Nov 2024 – Oct 2025) |
| | | Previous license period (-) | Current license period (Nov 2023 – Aug 2024) | |
| Belian Estate | 50,811.00 | - | 12,673.58 | 24,100.00 |
| Tengkawang Estate | 81,885.00 | - | 10,187.00 | 22,100.00 |
| Total | 132,696.00 | 22,860.58 | | 46,200.00* |

Note:

*Based on memorandum Regional Controller Region Semitau No. 025/RC/SMT/X/2022 dated 1 November 2022 related to transporting certified/uncertified FFB mechanism to Belian Mill. List of areas certified and non-certified areas along with map of Belian and Tengkawang Estate attached. Based on updated database, total planted area 5,045.67 Ha; certified area 1,725.78 Ha; non-certified area 3,319.89 Ha (self-downgraded certified areas for simplify supply chain implementation). From this situation, the forecast FFB volume in the next license is based on the total planted area of 1,725.78 Ha instead.

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

| Estate / Smallholders | Tonnage (MT) / year | | | |
|--------------------------|--|---------------------------------|---|-----------------------------------|
| | Estimated last year (Nov 2023 – Oct 2024) | Actual (Nov 2023 – Aug 2024) | | Forecast (Nov 2024 – Oct 2025) |
| | | Previous license period (-) | Current license period (Nov 2023 – Aug 2024) | |
| N/A | | N/A | N/A | |
| Total | | N/A | | |

Note: -

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

| Out growers / smallholders | Tonnage (MT) / year | | | |
|-------------------------------|--|---------------------------------|------------------------|-----------------------------------|
| | Estimated Last Year (Nov 2023 – Oct 2024) | Actual (Nov 2023 – Aug 2024) | | Forecast (Nov 2024 – Oct 2025) |
| | | Previous License Period | Current License Period | |

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| | | (-) | (Nov 2023 – Aug 2024) | |
|------------------------------------|-------------------|-------------------|-----------------------|-------------------|
| *Belian Estate (Non Certified) | 13,969.66 | - | 19,294.00 | 25,639.96 |
| *Tengkawang Estate (Non Certified) | 42,149.17 | - | 39,034.83 | 61,076.17 |
| Belian Plasma | 30,185.91 | - | 25,301.38 | 40,807.00 |
| Kapuas Hulu Estate | 61,465.84 | - | 51,334.29 | 68,846.00 |
| Sungai Beran Estate | 66,761.16 | - | 56,359.74 | 76,435.00 |
| Kapuas Hulu Plasma | 23,263.86 | - | 19,315.95 | 29,108.00 |
| Muara Tawang Estate | 48,866.50 | - | 41,235.85 | 58,294.00 |
| Muara Tawang Plasma | 19,296.53 | - | 15,871.38 | 23,249.00 |
| Total | 305,958.63 | 267,747.42 | | 383,455.13 |

Note:

*Based on memorandum Regional Controller Region Semitau No. 025/RC/SMT/X/2022 dated 1 November 2022 related to transporting certified/uncertified FFB mechanism to Belian Mill. List of areas certified and non-certified areas along with map of Belian and Tengkawang Estate attached. Based on updated database, total planted area 5,045.67 Ha; certified area 1,725.78 Ha; non-certified area 3,319.89 Ha (self-downgraded certified areas for simplify supply chain implementation).

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit

| No. | Month - Year | Volume of FFB from certified supply base (mt) | Volume of FFB from uncertified supply base (mt) | Total FFB/Month (mt) |
|--------------|--------------|---|---|----------------------|
| 1 | Nov 2023 | 0.00 | 31,727.18 | 31,727.18 |
| 2 | Dec 2023 | 940.68 | 32,869.44 | 33,810.12 |
| 3 | Jan 2024 | 2,795.09 | 27,627.58 | 30,422.67 |
| 4 | Feb 2024 | 2,734.63 | 24,740.22 | 27,474.85 |
| 5 | Mar 2024 | 2,371.15 | 22,044.49 | 24,415.64 |
| 6 | Apr 2024 | 2,614.20 | 23,350.94 | 25,965.14 |
| 7 | May 2024 | 2,460.38 | 22,577.12 | 25,037.50 |
| 8 | Jun 2024 | 2,472.11 | 23,188.81 | 25,660.92 |
| 9 | Jul 2024 | 2,802.42 | 27,161.90 | 29,964.32 |
| 10 | Aug 2024 | 3,669.91 | 32,459.75 | 36,129.66 |
| TOTAL | | 22,860.58 | 267,747.41 | 290,608.00 |

Note:

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

| Estimated last year | Actual | Forecast* |
|---------------------|--------|-----------|
|---------------------|--------|-----------|

| (Nov 2023 – Oct 2024) | (Nov 2023 – Aug 2024) | | (Nov 2024 – Oct 2025) |
|--------------------------|--------------------------------|---|--------------------------|
| | Previous license period (-) | Current license period (Nov 2023 – Aug 2024) | |
| FFB | FFB | | FFB |
| 132,696.00 mt | - | 22,860.58 mt | 46,200.00 mt |
| | TOTAL | 22,860.58 mt | |
| CPO (OER: 24.00%) | CPO (OER: 24.02%) | | CPO (OER: 25.00%) |
| 31,847.00 mt | - | 5,493.59 mt | 11,550.00 mt |
| | TOTAL | 5,493.59 mt | |
| PK (KER: 6.00%) | PK (KER: 5.91%) | | PK (KER: 6.00%) |
| 7,961.00 mt | - | 1,351.43 mt | 2,772.00 mt |
| | TOTAL | 1,351.43 mt | |

Note:

*Next year forecast decreased comparing to previous forecast due to memorandum Regional Controller Region Semitau No. 025/RC/SMT/X/2022 dated 1 November 2022 related to transporting certified/uncertified FFB mechanism to Belian Mill. List of areas certified and non-certified areas along with map of Belian and Tengawang Estate attached. Based on updated database, total planted area 5,045.67 Ha; certified area 1,725.78 Ha; non-certified area 3,319.89 Ha (self-downgraded certified areas for simplify supply chain implementation).

| 10A. Monthly Records of Certified CPO & PK since the last audit | | | |
|---|--------------|--------------------|--------------------|
| No. | Month - Year | Certified CPO (MT) | Certified PK (MT) |
| 1 | Nov 2023 | - | - |
| 2 | Dec 2023 | 233.731 | 56.934 |
| 3 | Jan 2024 | 673.471 | 169.593 |
| 4 | Feb 2024 | 682.059 | 171.607 |
| 5 | Mar 2024 | 575.308 | 152.917 |
| 6 | Apr 2024 | 625.805 | 155.253 |
| 7 | May 2024 | 593.436 | 145.513 |
| 8 | Jun 2024 | 586.425 | 125.617 |
| 9 | Jul 2024 | 662.487 | 149.312 |
| 10 | Aug 2024 | 860.866 | 224.685 |
| TOTAL | | *5,493.588 | **1,351.431 |

Note:

*rounded into 5,493.59 MT

**rounded into 1,351.43 MT

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| 11. Summary of Actual Volume sold | | | | | |
|---|----------------|-------------------------|--------|--------------|----------|
| Current License period (Nov 2023 – Aug 2024) | | | | | |
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | Others | | |
| CPO (MT) | 3,759.03 | - | - | - | 3,759.03 |
| PK (MT) | 634.76 | - | - | 199.30 | 834.06 |
| Credits | - | - | - | - | - |
| Previous License period (-) | | | | | |
| CPO (MT) | - | - | - | - | - |
| PK (MT) | - | - | - | - | - |
| Credits | - | - | - | - | - |
| Note: Conventional is RSPO certified material but sold as non-RSPO. | | | | | |

| 11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) | | | | |
|---|-------------|----------------------------------|-------------------------|------------------------|
| No. | Buyers Name | PalmTrace Trading License Number | Certified CPO Sold (MT) | Certified PK Sold (MT) |
| 1 | Buyer A | TR-c1267d09-57c4 | 507.53 | - |
| 2 | Buyer A | TR-011cc4a8-de49 | 1,457.33 | - |
| 3 | Buyer B | TR-afb75d18-c42f | 297.84 | - |
| 4 | Buyer B | TR-b6139816-2251 | 745.95 | - |
| 5 | Buyer C | TR-1c304012-590c | - | 496.19 |
| 6 | Buyer C | TR-74b6ecb7-0eb5 | - | 138.57 |
| 7 | Buyer A | TR-cc96c2af-a47c | 750.38 | - |
| TOTAL | | | 3,759.03 | 634.76 |
| Note: - | | | | |

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

| 11C. Records of CPO & PK Sold as conventional since the last audit (if any) |
|---|
|---|

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| No. | Buyers Name | CPO Sold (MT) | PK Sold (MT) |
|---------------|-------------|---------------|---------------|
| | Buyer D | - | 199.30 |
| TOTAL | | - | 199.30 |
| Note:- | | | |

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

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

| 12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit | | | | | | |
|--|--------------|----------|--------------------|-------------------|--------------------|--------------------|
| No. | Month - Year | FFB (MT) | Certified CPO (MT) | Certified PK (MT) | Certified PKO (MT) | Certified PKE (MT) |
| | N/A | N/A | N/A | N/A | N/A | N/A |
| TOTAL | | | | | | |
| Note: 1 mt = 1 credit | | | | | | |
| Notes for Auditor: Please refer to table 9A for reporting period | | | | | | |

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

| | | | | | | | |
|--|-----|-----|-----|-----|-----|-----|-----|
| Credits | | | | N/A | N/A | N/A | N/A |
| Physical | N/A | N/A | N/A | | | | |
| Previous License period (key in period) | | | | | | | |
| Credits | | | | N/A | N/A | N/A | N/A |
| Physical | N/A | N/A | N/A | | | | |

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639
Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 23 – 25 September 2024. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **21 November 2024**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

| Assessment Program | | | | | |
|------------------------------|---------------------------|-------------------|-------------------|-------------------|-------------------|
| Name (Mill / Supply Base) | Year 1 (Certification) | Year 2 (ASA 1) | Year 3 (ASA 2) | Year 4 (ASA 3) | Year 5 (ASA 4) |
| Belian Palm Oil Mill | √ | √ | √ | √ | √ |
| Belian Estate | √ | √ | √ | √ | √ |
| Tengkawang Estate | √ | √ | √ | √ | √ |

Tentative Date of Next Visit: September 1, 2025 - September 3, 2025

Total Number of Mandays: 14 mandays

2.2 BSI Assessment Team

| Name | Role | Competency |
|-----------------------------|-------------|---|
| Andi Pratama Pasaribu (APP) | Team Leader | <p>Education: Holds a Bachelor degree, majoring Social Economy (Agribusiness), Faculty of Agriculture, University of Jember.</p> <p>Work Experience: Has more than 5 years as Field Agronomy Assistant (2008 – 2013), Sustainability Auditor (8 years).</p> <p>Training attended: Has completed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO), Endorsed RSPO P&C Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, ISO 45001 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMETA requirements training, RSPO Independent Smallholder Training by RSPO Secretariat and Endorsed RSPO Refresher Trainings.</p> <p>Aspect covered in this audit: Social requirements, Stakeholder Consultation, workers' welfare, smallholder welfare.</p> <p>Language proficiency: Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p> |
| Eko Purwanto (EP) | Team Member | <p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB), 2001.</p> <p>Work Experience: Has more than 9 years working experience at Oil Palm Plantation in East Kalimantan and the last position was Estate Manager. He</p> |

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| | | <p>has implementing good agricultural practice including integrated pest management and limited pesticides uses. Has 10 years working experience in auditing and qualified Lead Auditor for ISO 9001 management system and qualified Lead Auditor for RSPO and ISPO.</p> <p>Training attended: Has completed the following training – SMETA Requirements Training; ISPO Permentan 38/2020; HCV-HCS Assessment Training, February 2021; CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course (PR357); ISO 37001:2016 Anti-bribery Management System Implementing Training Course; Endorsed RSPO P&C 2018 Training; ISO 17021:2015 Certificate Transfer; Sustainability Reporting Assurance Training; RSPO P&C Lead Auditor Refresher Course; RSPO Supply Chain Certification Refresher Course; RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat; Elaborating on the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing; RABQSA accredited Lead Auditor Training of Environment Management System; Endorsed RSPO Green House Gas (GHG) Training for Trainer; Endorsed RSPO P&C Lead Auditor Training; Understanding Environmental Management System (EMS); Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training; Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training; RABQSA accredited Lead Auditor Training of Quality Management System and RSPO Independent Smallholder Training by RSPO Secretariat.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p> |
| Edy Widodo | Team Member | <p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p> |
| Sansan Suhendar | Team Member | <p>Education:</p> <p>Hold a bachelor's degree in Forest Product Technology from Forestry Faculty – Bogor Agricultural University (IPB)</p> <p>Work Experience:</p> |

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| | | <p>OHS staff at PT. Astra Agro Lestari (PT. Sumber Kharisma Persada and PT. Sari Aditya Loka 1), RSPO and ISPO Auditor at PT. SAI Global Indonesia, RSPO and ISPO Auditor at PT. Mutuagung Lestari, RSPO and ISPO Lead Auditor at PT. SGS Indonesia, RSPO & ISPO Lead Auditor at PT. TUV Rheinland Indonesia and RSPO & ISPO Lead Auditor at PT. BSI - current.</p> <p>Training attended:</p> <p>RSPO Lead Auditor Training, ISPO Lead Auditor Training (ISPO Commission), ISO 9001 Lead Auditor Training, ISO 45001 Lead Auditor Training, ISO 14001 Lead Auditor Training, HCV training, GHG training, HACCP training, General OHS Expert training and RSPO Lead Auditor Standard 2018 Refreshment Training (2023).</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p> |
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Accompanying Persons:

| Name | Role |
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| Yuniar Mitikauji | Observer |

2.3 Assessment Plan

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

| Date | Time | Subjects | AP | EP | EW | SS |
|-----------------------|---------------|--|----|----|----|----|
| Sunday, 22/09/2024 | 05.30 – 07.00 | Traveling Jakarta – Pontianak (IU-684) | √ | √ | √ | √ |
| | 08.00 – 09.00 | Traveling Pontianak – Sintang (IW-1370) | √ | √ | √ | √ |
| | 09.00 – 15.00 | Sintang – Site Belian Mill | √ | √ | √ | √ |
| Monday, 23/09/2024 | 08.00 – 09.00 | Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) | √ | √ | √ | √ |

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| Date | Time | Subjects | AP | EP | EW | SS |
|---------------------|---------------|--|----|----|----|----|
| | 09.00 – 12.00 | Document Review Estate and Mill: <ul style="list-style-type: none"> Legal & Land Rights Social and Transparency Environmental, Waste Management & HCV Occupational Health & Safety Best Management Practices Worker Welfare Review of previous assessment findings. | √ | √ | √ | √ |
| | | Public consultation with government services of Kabupaten Kapuas Hulu (by phone) | | | √ | |
| | | Public consultation with external stakeholders (village representatives and local communities, previous landowner) | | | | √ |
| | | Public consultation with external stakeholders (local contractor) | | √ | | |
| | | Public consultation with external stakeholders (FFB Supplier) | √ | | | |
| | 12.00 – 14.00 | Break | √ | √ | √ | √ |
| | 14.00 – 16.30 | Field Visit Belian Mill <ul style="list-style-type: none"> BMP for Mill Processing – site visit Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, Processing Activities) Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, Biogas Plant – if any) Supply Chain for CPO Mill (site visit) - FFB Receiving, Weighbridge, Dispatch CPO. | | √ | | |
| | 16.30 – 17.00 | Wash up meeting | √ | √ | √ | √ |
| Tuesday, 24/09/2024 | 08.00 – 12.00 | Field visit Belian Estate <ul style="list-style-type: none"> Implementation of Agronomy Aspect Implementation of Environmental, Conservation and Waste Management Aspect Implementation of Occupational Health & Safety Aspect Implementation of Legal Aspect and Land Rights | √ | √ | √ | √ |

| Date | Time | Subjects | AP | EP | EW | SS |
|-------------------------|---------------|--|----|----|----|----|
| | 12.00 – 14.00 | Break | | | | |
| | 14.00 – 16.30 | Document review continuation | √ | √ | √ | √ |
| | 16.30 – 17.00 | Wash up meeting | √ | √ | √ | √ |
| Wednesday 25/09/2024 | 08.00 – 12.00 | Field visit Tengkawang Estate <ul style="list-style-type: none"> Implementation of Agronomy Aspect Implementation of Environmental, Conservation and Waste Management Aspect Implementation of Occupational Health & Safety Aspect Implementation of Legal Aspect and Land Rights | √ | √ | √ | √ |
| | 12.00 – 14.00 | Break | √ | √ | √ | √ |
| | 14.00 – 16.30 | Document review continuation | √ | √ | √ | √ |
| | 16.30 – 17.00 | Wash up meeting | √ | √ | √ | √ |
| | 08.00 – 12.00 | Document review continuation | √ | √ | √ | √ |
| | 12.00 – 14.00 | Break | √ | √ | √ | √ |
| Thursday, 26/09/2024 | 15.00 – 16.00 | Closing meeting | √ | √ | √ | √ |
| | 16.00 – 20.00 | Traveling Site – Sintang | √ | √ | √ | √ |
| | 09.20 – 10.10 | Traveling Sintang – Pontianak (IW-1371) | √ | √ | √ | √ |
| | 11.55 – 13.20 | Traveling Pontianak - Jakarta (IU-687) | √ | √ | √ | √ |

NCR Close Out Visit Plan

| Date | Time | Subjects | AP |
|-------------------------|---------------|--|----|
| Thursday, 21/11/2024 | 08.00 – 08.30 | Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) | √ |
| | 08.30 – 10.00 | Verification on Critical Noncompliance Finding Reference #2553263-202409-M2 | √ |
| | 10.00 – 10.30 | Closing meeting | |

Remote audit techniques: Client presented the CAP including the CAP's evidences through MS-Team (screen share documents, video call to show the condition in the ground and sharing video recording through Whatsapp) while auditor verified each evidences. CAP evidence share through emails

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Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

| Requirement | Assessment | Compliance |
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| Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company? | Yes. Golden Agri Resources' RSPO Timebound Plan 2024-2027 dated 2 May 2024 include names of all subsidiary companies, all estates and all mills under Golden Agri Resources Ltd. | Complied |
| Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021 | No. The RSPO Membership for Golden Agri Resources dated 30 January 2005. Golden Agri Resources submitted RSPO Timebound Plan 2024-2027 to RSPO Secretariat. RSPO approved the timebound plan for GAR on 2 May 2024. | Complied |
| Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021. | Yes. Golden Agri Resources reported new acquisition in RSPO Timebound Plan 2024-2027. RSPO approved the timebound plan for GAR on 2 May 2024. | Complied |
| Any deviations from the maximum periods requires approval by the RSPO Secretariat. | Yes. There was deviation to the time-bound plan compared to 2022. Golden Agri Resources reported new time bound plan that is more than 5 or 3 years since membership date in RSPO Timebound Plan 2024-2027. RSPO approved the timebound plan for GAR on 2 May 2024. | Complied |
| Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting? | Yes. There were changes to the time-bound plan compared to 2022. Golden Agri Resources reported new acquisition in RSPO Timebound Plan 2024-2027. RSPO approved the timebound plan for GAR on 2 May 2024 | Complied |
| Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised | No. Golden Agri Resources submitted RSPO Timebound Plan 2024-2027 to RSPO Secretariat. RSPO approved the timebound plan for GAR on 2 May 2024. | Complied |
| Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised | No. The RSPO Membership for Golden Agri Resources dated 30 January 2005. Golden Agri Resources submitted RSPO Timebound Plan 2024-2027 to RSPO Secretariat. RSPO approved the timebound plan for GAR on 2 May 2024. | Complied |
| Un-Certified Units or Holdings | | |

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| <p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p> | <p>Several companies under GAR were planted above November 2005, while the HCV assessment process was conducted in the period 2010 – 2013.</p> <p>Based on auditor verification, not all uncertified unit conduct new clearing after Nov 2005, but for uncertified unit with land clearing after Nov 2005 has follow RaCP. Detail information of uncertified unit are:</p> <ul style="list-style-type: none"> • PT Kencana Graha Permai - Kalimantan Barat (Delima Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel. • PT Agrolestari Sentosa – Kalimantan Tengah (Jalemo Estate, Manuhing Estate, Kajui Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted the Concept Note Project Batu Menangis on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel. • PT Sumber Indah Perkasa – Papua (Mambruk Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel. • PT Kresna Duta Agroindo – Kalimantan Timur (Gunung Kombeng Mill, Rantau Panjang Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel • PT Cahaya Nusa Gemilang – Kalimantan Barat (Kenanga Estate), LUCA report is in the process of being revised and will be sent to the RSPO. • PT Bangun Nusa Mandiri – Kalimantan Barat (Kenari Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. • PT Persada Graha Mandiri – Kalimantan Barat (Kapuas Hulu Estate and Sungai Beran Estate), LUCA report is in the process of being revised and will be sent to the RSPO. • PT Satya Kisma Usaha – Kalimantan Tengah (Medang Sari Estate), LUCA report is in the process of being revised and will be sent to the RSPO. • PT Binasawit Abadi Pratama – Kalimantan Tengah (Perdana Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. | <p>Complied</p> |
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| | <ul style="list-style-type: none"> • PT Aditungal Mahajaya – Kalimantan Tengah (Sungai Ayawan Estate), LUCA report is in the process of being revised and will be sent to the RSPO. • PT Mitrakarya Agroindo – Kalimantan Tengah (Tangar Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. • PT Agrokarya Primalestari – Kalimantan Tengah (Kuayan Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. • PT Buana Adhitama – Kalimantan Tengah (Sapiri Estate and Bukit Dua Estate), LUCA report is in the process of being revised and will be sent to the RSPO. • PT Sinar Kencana Inti Perkasa – Kalimantan Selatan (Sungai Magalau Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. • PT Sawita Karya Manunggul – Kalimantan Selatan (Sawita Mill and supply bases). Initial audit has been done in 18 – 23 September 2023 by PT Mutuagung Lestari (accredited CB). • PT Satya Kisma Usaha – Jambi (Batang Gading Estate), the LUCA report has been approved in 12 November 2021. • PT Sawit Mas Sejahtera – Sumatera Selatan, the LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN. • The companies were acquired by GAR on 2021 are PT Kruing Lestari Jaya (Sungai Perak Mill and supply bases), PT Harapan Rimba Raya (Sungai Kedang Mill and supply bases), PT Rimbaraya Tamajaya (Sungai Pahu Estate), PT Agrolestari Subur Sejahtera (Bukit Permai Estate), PT Agrolestari Hijau Sentosa (Bukit Lestari Estate), PT Kharisma Riau Sentosa Prima (Kharisma Estate), PT Mitranusa Permata (Sungai Manunggul Estate). The company is still collecting information and documentation regarding the fulfillment of RaCP obligations. <p>Golden Agri Resources has reported all replacement of primary forest to maintain HCV and HCS through submission of LUCA.</p> | |
| Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure. | <p>Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ul style="list-style-type: none"> • PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014. | Complied |

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| | <ul style="list-style-type: none"> • PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014. • PT Agrokarya Prima Lestari (Kuayan Mill and supply base): NPP on 26 April 2014 and PT Buana Adhitama (supply base) conduct NPP on 4 June 2014. • PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014. • PT Paramitra Internusa Pratama (Belian Mill and supply base): NPP on 3 June 2014, PT Kartika Prima Cipta (supply base) conduct NPP on 8 July 2014 and PT Persada Graha Mandiri (Supply base) conduct NPP on 6 June 2014. • PT Sawit Mas Sejahtera (Sungai Kikim and supply base): there is new planting after January 2010 in Sungai Kikim Estate and Sungai Saling Estate, the company does not conduct NPP. This is become subject of sanction. For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014. • PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010. • PT Agro Lestari Sentosa (Jalemo Mill and supply base): NPP on 26 April 2014. • PT Adi Tunggal Mahajaya (Sako Mill) (under construction): NPP on 25 April 2014, PT Agrokarya Prima Lestari (supply base) conduct NPP on 26 April 2014 and PT Mitra Karya Agroindo (supply base) conduct NPP on 26 April 2014. • PT SMART (Bukit Kapur Mill and supply base): there is no new land clearing after January 2010. • PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): NPP on 8 July 2014. • PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base): NPP on 8 July 2014. • PT Sawitakarya Manunggul (Sawita Mill and supply base): there is new land clearing after January 2010 in Sawita KKPA and company does not conduct NPP. This is become subject of sanction. | |
| Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8. | <p>Yes. In the RSPO Case Tracker and media electronic verification, audit team noted an active complaint related to land conflict and being progressed:</p> <ul style="list-style-type: none"> - Complaint Ref. RSPO/2021/12/CRP, date filed 8 November 2021 addressed to PT. Ramajaya Pramukti (a subsidiary of Golden Agri Resources Ltd) by Lembaga Adat Kenegerian Petapahan (Ninik Mamak Kenegerian Petapahan), Bahtera Alam & Sawit Watch. Current status per 26 July 2023: The Briefing Note is in the midst of a peer review. Pending clarification from the Respondent | Complied |

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| | <p>on some points raised. Update as of 3 May 2024: The complaint is formally closed.</p> <ul style="list-style-type: none"> - Based on information from electronic media on March 1, 2022, there was information that PT. Agro Lestari Sentosa for not building plasma plantations for the community. Based on confirmation with representatives of PT. Agro Lestari, it is known that the plasma area is still in the NPP process, and the target is to complete the NPP by the end of the 2023 quarter. - Based on electronic media on December 13, 2022, there is information on problems between Koperasi Perkebunan Bataduh Raya and PT. Bangun Nusa Mandiri. Based on confirmation with representatives of PT. Bangun Nusa Mandiri is known that there have been 15 agreements between cooperatives and companies, including PT. BNM is committed to building a plasma of 557.47 Ha and developing an area of 180 Ha for partnerships. Regarding overlapping land, the solution is <i>Vaicias</i> Data, namely the handover of land in PT. BNM with the Head of the Village and Koperasi Perkebunan Bataduh Raya. - Complaint RSPO/2021/11/HN, dated 11 July 2021, was lodged against PT SMART Tbk (West Kalimantan Region) regarding alleged procurement of Fresh Fruit Bunches (FFB) and Crude Palm Oil (CPO) from PT Kapuasindo Palm Industri (PT KPI), a subsidiary of Kencana Group (not an RSPO member), which had been involved in a series of violations against workers and indigenous communities in the district. The latest status indicates that the RSPO Complaint Panel issued a decision on the complaint on 17 January 2022, deciding to halt all proceedings related to the complaint. The decision letter was shared with both parties, providing them with an opportunity to file an appeal until 11 April 2022. Update as of 12 April 2022: The appeal submission period has concluded. The complaint is now formally closed. - Complaint RSPO/2020/04/IR dated 2 March 2020, against GAR (Central Kalimantan Region) by the Forest Peoples Programme & Elk Hills Research concerning allegations of land legality and bribery cases. From GAR's side, GIS-2 analysis for alert land clearance after November 2014, following discussions with the RSPO GIS manager on 21 May 2021, approved the sampling methodology. GAR's clarification report was submitted on 8 September 2021. However, regarding the legal review of anti-bribery policies and practices, the company rejected the ToR for the Legal Review on 26 March 2021. As of December 15, 2021, RSPO is awaiting the review results from the consultant. As of 31 May 2023, procurement process for the independent investigation is ongoing. The Expression of Interest along with the ToR | |
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| | <p>has been published on the RSPO website. Update as of 23 Oct 2024: The Secretariat proposed an Ad Hoc Meeting on 04/11/2024 to discuss the Briefing Note for deliberation.</p> <p>- Complaint PreCAP/2014/03/IR was lodged on 13 October 2014, against PT Kartika Prima Cipta (West Kalimantan) by the Forest Peoples Programme (FPP) & Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding the Free, Prior, and Informed Consent (FPIC) process and 6 other issues. With the consent of GAR and FPP, RSPO divided the conflict resolution verification process into 5 phases (Phase 1 for NPP, maximum land holding, and new land development; Phase 2 for legality; Phase 3 for smallholders; Phase 4 for FPIC; and Phase 5 for HCV). GAR has responded up to Phase 5 on 26 August 2021, addressing all stages. The latest status as of 15 December 2021, indicates that the RSPO Complaint Panel has reached a decision for Phase 2 and is awaiting discussions for Phase 3 and 4. Update as of 23 Oct 2024: The Secretariat proposed an Ad Hoc Meeting on 04/11/2024 to discuss the feedback from the CP on the Draft Decision Letter.</p> <p>In the RSPO RaCP Tracker, Audit team noted 34 MUs with potential liability, 22 MU with LUCA submitted, 20 MU with LUCAs review completed, 33 MU with CN required, 19 MU with CN submitted, 18 MU with CN approved, 11 MU with CP submitted, 11 MU with CP endorsed, 28 MU with RP required, 1 MU with RP submitted, 1 MU with RP approved.</p> | |
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2 | <p>In the RSPO Case Tracker, Audit team noted there was no active complaint related to labour disputes.</p> <p>The company has established procedures for addressing employee complaints before they escalate into conflicts. The procedure is the Complaint and Conflict Handling SOP, designated as SOP/SMART/SUST/IV/003, issued on 1 July 2014, with revision 3 on 8 March 2022.</p> <p>Procedures regarding employee issues are outlined in an internal flowchart because employees fall under the category of internal stakeholders. The means of lodging complaints involve official letters submitted through labour unions or deposited into suggestion boxes strategically placed in accessible locations.</p> | Complied |
| Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1 | <p>In the RSPO Case Tracker, Audit team noted there was not active complaint related to legal non-compliance.</p> <p>The company adheres to the applicable regulations in accordance with RSPO requirement 2.1.3, ensuring there are no violations of relevant plantation regulations. The company has established mechanisms to evaluate compliance with regulations as outlined in SOP/SMART/UMUM/SADV/I/002. This Standard Operating Procedure (SOP) outlines the procedures for meeting</p> | Complied |

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| | requirements, the necessary documentation, and flowcharts that provide a detailed process for evaluating compliance with legal regulations. | |
| Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified. | <p>Yes, Golden Agri Resources Ltd carried out internal audit for the uncertified estates and mills against RSPO P&C Criterion.</p> <ul style="list-style-type: none"> - Internal audit for PT Bina Sawit Abadi Pratama (Perdana Mill, Perdana Estate, Lenggana Estate, Semandau Estate and Muara Dua Estate) carried out on 15 - 19 July 2024. Internal audit team issued NC related to 2.1.1 and 7.12, management is preparing correction and corrective action. - Internal audit for PT Agrokarya Prima Lestari (Kuayan Mill, Bukit Santuhai Estate, Seranau, Estate, Sapiri Estate, Tajur Beras Estate, Bukit Dua Estate, Sapiri Plasma, Sungai Sambon Plasma) carried out on 18 – 22 November 2024. Internal audit team issued NC related to 2.1.1 and 7.12, management is preparing correction and corrective action. - Internal audit for PT Mitrakarya Agroindo (Tangar Mill, Sulin Estate, Nahiyang Estate, Katayang Estate, Sulin Plasma, Sei Rindu noncertified), carried out on 18 – 22 November 2024. Internal audit team issued NC related to 6.5.4, 7.3.1, 6.7.2, 6.7.3 and 7.2.10, management is preparing correction and corrective action - Internal audit for PT Persada Graha Mandiri (Kapuas Hulu Estate and Sungai Beran Estate), supply bases of Belian Mill; carried out on 2 – 6 September 2024 Internal audit team issued NC related to 6.5.4, 7.3.1, 6.7.2, 6.7.3 and 7.2.10, management is preparing correction and corrective action - Internal audit for PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate, Sungai Bungur Estate, Sungai Lingsing Estate) supply base to Sungai Kikim Mill carried out on 20 – 24 May 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. - Internal audit for PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill, Senakin Estate and Sungai Magalau Estate) carried out on 5 – 9 August 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. - Internal audit for PT Agrolestari Sentosa (Jalemo Mill, Manuhing Estate, Kajui Estate, Jalemo Estate and Manuhing Plasma) carried out on 7 – 11 October 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. | Complied |

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| | <ul style="list-style-type: none"> - Internal audit for PT Agrolestari Sentosa (Jalemo Mill, Manuhing Estate, Kajui Estate, Jalemo Estate and Manuhing Plasma) carried out on 7 – 11 October 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. - Internal audit for PT Aditunggal Mahajaya (Sako Mill, Mentaya Estate, Kuayan Estate, Sungai Nusa Estate, Sungai Ayawan Estate and Sako Plasma) carried out on 18 – 22 November 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. - Internal audit for PT Smart Tbk (Bukit Kapur Mill, Sungai Cantung Estate and Bukit Kapur Estate) carried out on 21 – 25 October 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. - Internal audit for PT Kresna Duta Agroindo (Rantau Panjang Plasma) supply base to Rantau Panjang Mill carried out on 12 – 16 August 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. - Internal audit for PT Kresna Duta Agroindo (Gunung Kombeng Plasma) supply base to Gunung Kombeng Mill carried out on 5 – 9 February 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. - Internal audit for PT Sawita Karya Manunggal (Sawita Plasma) supply base to Sawita Mill carried out on 1 – 5 July 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. - Internal audit for PT Bangun Nusa Mandiri (Kenari Mill, Gaharu Estate, Kenari Estate, Gaharu Plasma and Kenari Plasma) carried out on 9 – 11 October 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. - Internal audit for PT Bahana Karya Semesta (Sungai Air Jernih Mill, Sungai Air Jernih Estate, Sungai Mentawak Estate, Sungai Merak Estate and Sungai Badak Estate) carried out on 14 – 18 October 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. - Internal audit for PT Kruing Lestari Jaya (Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai | |
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| | <p>Pikan Estate, Sungai Pilos Estate, Sungai Pikan Plasma and Sungai Tohan Plasma) carried out on 28 October – 1 November 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action.</p> <ul style="list-style-type: none"> - Internal audit for PT Harapan Rimba Raya (Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Pahu Estate and Sungai Pahu Plasma) carried out on 28 October – 1 November 2024. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12.2, management is preparing correction and corrective action. <p>Audit checklist covers all RSPO P&C and RSPO Certification System requirement. Positive assurance statement stated in the internal audit reports reviewed.</p> | |
| Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO? | Yes, there are critical non-compliance raised during internal audits to uncertified management units. Most of the NCR for those uncertified management units are related to RaCP process and legal entity | Complied |
| Have there been any stakeholder (including NGO) consultation conducted? | <p>Audit team checked on internal audit reports and verified the stakeholder consultation carried out.</p> <p>In the RSPO Case Tracker, Audit team noted active complaint:</p> <ul style="list-style-type: none"> - Complaint Ref. RSPO/2021/12/CRP, date filed 8 November 2021 addressed to PT. Ramajaya Pramukti (a subsidiary of Golden Agri Resources Ltd) by Lembaga Adat Kenegerian Petapahan (Ninik Mamak Kenegerian Petapahan), Bahtera Alam & Sawit Watch. Current status per 26 July 2023: The Briefing Note is in the midst of a peer review. Pending clarification from the Respondent on some points raised. Update as of 3 May 2024: The complaint is formally closed. - Complaint Ref. RSPO/2020/04/IR, dated filed 2 March 2020 addressed to Golden Agri Resources Ltd., by Forest People Program & Elk Hills Research. Current status per 26 July 2023: Pending CP's endorsement of an independent investigator from the list of candidates submitted. - Has been done public consultation with NGO in the name of Orangutan Foundation International on 21 September 2023, related to issues on GAR unit on Kalimantan Tengah Province. Based on interview results, there's no negative issues related to conservation and environment. | Complied |

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| | For other stakeholders, audit team sent email to national NGOs, until assessment ends, audit team did not received response. | |
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3.2 Progress of scheme smallholders and/or outgrowers

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | |
|--|--|------------|
| Requirement | Remarks | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years. | As per this annual surveillance audit, scheme smallholders and/or scheme outgrowers are not included yet in certification program. | Complied |

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Approved Time Bound Plan

GAR has submitted the latest Time Bound Plan to the RSPO Secretariat on 3 April 2024 and got approval on 2 May 2024.

| NO | COMPANY | LOCATION | MILL / ESTATE | | PLANTED AREA (Ha) | PREVIOUS TIMEBOUND | NEW TIMEBOUND | JUSTIFICATION |
|------------------------------------|---|--------------------|---------------|---------------------|-------------------|--------------------|---------------|--|
| SUPPLY BASE OF NON CERTIFIED MILLS | | | | | | | | |
| 1 | PT PARAMITRA INTERNUSA PRATAMA | KALIMANTAN BARAT | BLNM | BELIAN MILL | | 2021 | 2024 | RaCP in Progress |
| 1.1 | PT PARAMITRA INTERNUSA PRATAMA | KALIMANTAN BARAT | BLNE | BELIAN ESTATE | 1,949 | 2021 | 2024 | |
| 1.2 | PT PARAMITRA INTERNUSA PRATAMA | KALIMANTAN BARAT | TNKE | TENGKAWANG ESTATE | 3,467 | 2021 | 2024 | |
| 1.3 | PT PERSADA GRAHA MANDIRI | KALIMANTAN BARAT | KHLE | KAPUAS HULU ESTATE | 2,703 | 2021 | 2025 | RaCP in progress; Concept Note reviewing process in RSPO |
| 1.4 | PT PERSADA GRAHA MANDIRI | KALIMANTAN BARAT | SBRE | SUNGAI BERAN ESTATE | 2,811 | 2021 | 2025 | |
| 1.5 | PT KARTIKA PRIMA CIPTA | KALIMANTAN BARAT | MTNE | MUARA TAWANG ESTATE | 2,377 | 2021 | 2025 | RaCP in progress; Concept Note reviewing process in RSPO |
| 1.6 | PT PARAMITRA INTERNUSA PRATAMA (PLASMA) | KALIMANTAN BARAT | BLNA | BELIAN KKPA | 1,798 | 2022 | 2026 | Land legality process |
| 1.7 | PT KARTIKA PRIMA CIPTA (PLASMA) | KALIMANTAN BARAT | MTNA | MUARA TAWANG KKPA | 1,052 | 2022 | 2024 | Land legality process |
| 1.8 | PT PERSADA GRAHA MANDIRI (PLASMA) | KALIMANTAN BARAT | KHLA | KAPUAS HULU KKPA | 1,188 | 2022 | 2024 | Land legality process |
| 2 | PT AGROLESTARI MANDIRI | KALIMANTAN BARAT | PKWM | PEKAWAI MILL | | 2021 | 2024 | RaCP Process |
| 2.1 | PT AGROLESTARI MANDIRI | KALIMANTAN BARAT | KYNE | KAYUNG ESTATE | 2,210 | 2021 | 2024 | |
| 2.2 | PT AGROLESTARI MANDIRI | KALIMANTAN BARAT | PKWE | PEKAWAI ESTATE | 2,868 | 2021 | 2024 | |
| 2.3 | PT AGROLESTARI MANDIRI | KALIMANTAN BARAT | SKKE | SUNGAI KELIK ESTATE | 2,467 | 2021 | 2024 | |
| 2.4 | PT AGROLESTARI MANDIRI | KALIMANTAN BARAT | NTYE | NANGA TAYAP ESTATE | 2,008 | 2021 | 2024 | |
| 2.5 | PT AGROLESTARI MANDIRI (PLASMA) | KALIMANTAN BARAT | KYNA | KAYUNG KEMITRAAN | 2,651 | 2022 | 2026 | Land title (SHM) in progress, RaCP in progress |
| 3 | PT SAWITAKARYA MANUNGGUL | KALIMANTAN SELATAN | SWTM | SAWITA MILL | | 2021 | 2023 | Has been certified |

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| | | | | | | | | |
|----------|--------------------------------------|---------------------------|-------------|----------------------------|-------|-------------|-------------|---|
| 3.1 | PT SAWITAKARYA MANUNGGUL | KALIMANTAN SELATAN | SWTE | SAWITA ESTATE | 3,810 | 2021 | 2023 | Land legality process |
| 3.2 | PT SAWITAKARYA MANUNGGUL | KALIMANTAN SELATAN | PMKE | PAMUKAN ESTATE | 2,972 | 2021 | 2023 | |
| 3.3 | PT SAWITAKARYA MANUNGGUL (PLASMA) | KALIMANTAN SELATAN | SWTA | SAWITA KKPA | 1,154 | 2023 | 2024 | |
| 4 | PT KRESNA DUTA AGROINDO | KALIMANTAN TIMUR | RPNM | RANTAU PANJANG MILL | | 2022 | 2023 | Has been certified |
| 4.1 | PT KRESNA DUTA AGROINDO | KALIMANTAN TIMUR | RPNE | RANTAU PANJANG ESTATE | 4,689 | 2022 | 2023 | Land title (SHM) in progress |
| 4.2 | PT KRESNA DUTA AGROINDO (PLASMA) | KALIMANTAN TIMUR | RPNA | RANTAU PANJANG KKPA | 982 | 2023 | 2027 | |
| 5 | PT SAWIT MAS SEJAHTERA | SUMATERA SELATAN | SKMM | SUNGAI KIKIM | | 2022 | 2023 | Has been certified |
| 5.1 | PT SAWIT MAS SEJAHTERA | SUMATERA SELATAN | SKME | SUNGAI KIKIM ESTATE | 1,845 | 2022 | 2023 | RaCP in progress; Concept Note reviewing process in RSPO |
| 5.2 | PT SAWIT MAS SEJAHTERA | SUMATERA SELATAN | SPGE | SUNGAI PANGI ESTATE | 3,119 | 2022 | 2023 | |
| 5.3 | PT SAWIT MAS SEJAHTERA | SUMATERA SELATAN | SMIE | SUNGAI MUSI ESTATE | 1,736 | 2022 | 2023 | |
| 5.4 | PT SAWIT MAS SEJAHTERA | SUMATERA SELATAN | SSLE | SUNGAI SALING ESTATE | 2,161 | 2022 | 2023 | |
| 5.5 | PT BUMI SAWIT PERMAI | SUMATERA SELATAN | SENE | SUNGAI ENIM ESTATE | 1,725 | 2022 | 2025 | |
| 5.6 | PT BUMI SAWIT PERMAI | SUMATERA SELATAN | SLME | SUNGAI LEMATANG ESTATE | 2,081 | 2022 | 2025 | RaCP in progress; Concept Note reviewing process in RSPO |
| 5.7 | PT PRIMA CIPTA MANDIRI | SUMATERA SELATAN | SBGE | SUNGAI BUNGUR ESTATE | 2,323 | 2022 | 2025 | |
| 5.8 | PT PRIMA CIPTA MANDIRI | SUMATERA SELATAN | SLGE | SUNGAI LINGSING ESTATE | 1,025 | 2022 | 2025 | RaCP in Progress |
| 6 | PT SINAR KENCANA INTI PERKASA | KALIMANTAN SELATAN | SMGM | SUNGAI MAGALAU MILL | | 2023 | 2026 | |
| 6.1 | PT SINAR KENCANA INTI PERKASA | KALIMANTAN SELATAN | SNKE | SENAKIN ESTATE | 2,787 | 2023 | 2026 | |
| 6.2 | PT SINAR KENCANA INTI PERKASA | KALIMANTAN SELATAN | SMUE | SUNGAI MAGALAU ESTATE | 1,707 | 2023 | 2026 | RaCP in Progress |
| 7 | PT KRESNA DUTA AGROINDO | KALIMANTAN TIMUR | GKMM | GUNUNG KOMBENG MILL | | 2023 | - | Exclude from timebound plan due to operation discontinued |
| 7.1 | PT KRESNA DUTA AGROINDO (PLASMA) | KALIMANTAN TIMUR | GKMA | GUNUNG KOMBENG KKPA | 2,214 | 2023 | 2026 | Land Title in Progress (supply base of Muara Wahau Mill) |

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| 8 | PT SINAR KENCANA INTI PERKASA | PAPUA | KSRM | KASUARI MILL | | 2023 | 2023 | Certified |
|------|----------------------------------|--------------------|------|--------------------------|-------|------|------|--|
| 8.1 | PT SINAR KENCANA INTI PERKASA | PAPUA | CNDE | CENDRAWASIH ESTATE | 2,691 | 2023 | 2023 | RaCP in progress; Concept Note reviewing process in RSPO |
| 8.2 | PT SINAR KENCANA INTI PERKASA | PAPUA | NURE | NURI ESTATE | 2,532 | 2023 | 2023 | |
| 8.3 | PT SINAR KENCANA INTI PERKASA | PAPUA | RJWE | RAJAWALI ESTATE | 3,675 | 2023 | 2023 | |
| 8.4 | PT SUMBER INDAH PERKASA | PAPUA | MMBE | MAMBRUK ESTATE | 3,473 | 2023 | 2025 | |
| 9 | PT BAHANA KARYA SEMESTA | JAMBI | SAJM | SUNGAI AIR JERNIH MILL | | 2023 | 2025 | RaCP in progress |
| 9.1 | PT BAHANA KARYA SEMESTA | JAMBI | SAJE | SUNGAI AIR JERNIH ESTATE | 2,963 | 2023 | 2025 | RaCP in progress |
| 9.2 | PT BAHANA KARYA SEMESTA | JAMBI | SMTE | SUNGAI MENTAWAK ESTATE | 2,754 | 2023 | 2025 | |
| 9.3 | PT PRIMATAMA KREASI MAS | JAMBI | SMKE | SUNGAI MERAK ESTATE | 3,969 | 2023 | 2025 | |
| 9.4 | PT PRIMATAMA KREASI MAS | JAMBI | SBKE | SUNGAI BADAK ESTATE | 1,576 | 2023 | - | |
| 9.5 | PT BAHANA KARYA SEMESTA (PLASMA) | JAMBI | SMTA | SUNGAI MENTAWAK KKPA | 922 | 2023 | 2026 | RaCP in progress |
| 10 | PT SMART TBK | KALIMANTAN SELATAN | BKPM | BUKIT KAPUR MILL | | 2023 | 2027 | HGU in progress, HCV/HCS Study in progress |
| 10.1 | PT SMART TBK | KALIMANTAN SELATAN | SCNE | SUNGAI CANTUNG ESTATE | 3,473 | 2023 | 2027 | HGU in progress |
| 10.2 | PT SMART TBK | KALIMANTAN SELATAN | BKPE | BUKIT KAPUR ESTATE | 2,950 | 2023 | 2027 | |
| 11 | PT BINASAWIT ABADI PRATAMA | KALIMANTAN TENGAH | PRDM | PERDANA MILL | | 2023 | 2027 | |
| 11.1 | PT BINASAWIT ABADI PRATAMA | KALIMANTAN TENGAH | PRDE | PERDANA ESTATE | 4,007 | 2023 | 2027 | |
| 11.2 | PT BINASAWIT ABADI PRATAMA | KALIMANTAN TENGAH | LGGE | LENGGANA ESTATE | 2,275 | 2023 | 2027 | HGU in progress |
| 11.3 | PT BINASAWIT ABADI PRATAMA | KALIMANTAN TENGAH | SMNE | SEMANDAU ESTATE | 3,789 | 2023 | 2027 | |
| 11.4 | PT BINASAWIT ABADI PRATAMA | KALIMANTAN TENGAH | MDUE | MUARA DUA ESTATE | 4,116 | 2023 | 2027 | |

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| 12 | PT AGROKARYA PRIMA LESTARI | KALIMANTAN TENGAH | KUYM | KUAYAN MILL | | 2023 | 2027 | HGU in progress, RaCP in progress |
|-----------|------------------------------------|--------------------------|-------------|-----------------------|-------|-------------|-------------|--------------------------------------|
| 12.1 | PT AGROKARYA PRIMA LESTARI | KALIMANTAN TENGAH | BSTE | BUKIT SANTUHAI ESTATE | 3,635 | 2023 | 2027 | |
| 12.2 | PT AGROKARYA PRIMA LESTARI | KALIMANTAN TENGAH | TBSE | TAJUR BERAS ESTATE | 3,667 | 2023 | 2027 | |
| 12.3 | PT AGROKARYA PRIMA LESTARI | KALIMANTAN TENGAH | SRAE | SERANAU ESTATE | 3,654 | 2023 | 2027 | |
| 12.4 | PT AGROKARYA PRIMALESTARI (PLASMA) | KALIMANTAN TENGAH | SSBA | SUNGAI SAMBON PLASMA | 470 | 2023 | 2027 | |
| 12.5 | PT BUANA ADHITHAMA | KALIMANTAN TENGAH | SPRE | SAPIRI ESTATE | 2,392 | 2023 | 2027 | |
| 12.6 | PT BUANA ADHITAMA (PLASMA) | KALIMANTAN TENGAH | SPRA | SAPIRI PLASMA | 435 | 2023 | 2027 | |
| 12.7 | PT BUANA ADHITHAMA | KALIMANTAN TENGAH | BDUE | BUKIT DUA ESTATE | 1,805 | 2023 | 2027 | |
| 13 | PT MITRAKARYA AGROINDO | KALIMANTAN TENGAH | TNGM | TANGAR MILL | | 2023 | 2027 | HGU in progress, RaCP in progress |
| 13.1 | PT MITRA KARYA AGROINDO | KALIMANTAN TENGAH | SLNE | SULIN ESTATE | 4,173 | 2023 | 2027 | |
| 13.2 | PT MITRA KARYA AGROINDO | KALIMANTAN TENGAH | NHYE | NAHIYANG ESTATE | 3,723 | 2023 | 2027 | |
| 13.3 | PT MITRA KARYA AGROINDO | KALIMANTAN TENGAH | KTYE | KATAYANG ESTATE | 3,443 | 2023 | 2027 | |
| 13.4 | PT MITRAKARYA AGROINDO (PLASMA) | KALIMANTAN TENGAH | SLNA | SULIN PLASMA | 1,677 | 2023 | 2027 | |
| 14 | PT ADITUNGGAL MAHAJAYA | KALIMANTAN TENGAH | SKOM | SAKO MILL | | 2023 | 2027 | HGU in progress, RaCP in progress |
| 14.1 | PT AGROKARYA PRIMA LESTARI | KALIMANTAN TENGAH | MNTE | MENTAYA ESTATE | 3,342 | 2023 | 2027 | |
| 14.2 | PT AGROKARYA PRIMA LESTARI | KALIMANTAN TENGAH | KUYE | KUAYAN ESTATE | 3,520 | 2023 | 2027 | |
| 14.3 | PT MITRA KARYA AGROINDO | KALIMANTAN TENGAH | SNSE | SUNGAI NUSA ESTATE | 3,219 | 2023 | 2027 | |
| 14.4 | PT ADITUNGGAL MAHAJAYA | KALIMANTAN TENGAH | SAYE | SUNGAI AYAWAN ESTATE | 3,733 | 2023 | 2027 | |
| 14.5 | PT ADITUNGGAL MAHAJAYA (PLASMA) | KALIMANTAN TENGAH | SKOA | SAKO PLASMA | 1,014 | 2023 | 2027 | |
| 15 | PT AGROLESTARI SENTOSA | KALIMANTAN TENGAH | JLMM | JALEMO MILL | | 2025 | 2026 | HGU in progress, RaCP in progress |
| 15.1 | PT AGROLESTARI SENTOSA | KALIMANTAN TENGAH | MNHE | MANUHING ESTATE | 2,121 | 2025 | 2026 | |
| 15.2 | PT AGROLESTARI SENTOSA | KALIMANTAN TENGAH | KJUE | KAJUI ESTATE | 3,571 | 2025 | 2026 | |
| 15.3 | PT AGROLESTARI SENTOSA | KALIMANTAN TENGAH | JLME | JALEMO ESTATE | 3,351 | 2025 | 2026 | |
| 15.4 | PT AGROLESTARI SENTOSA (PLASMA) | KALIMANTAN TENGAH | MNHA | MANUHING PLASMA | 65 | 2025 | 2027 | |

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| 16 | PT BANGUN NUSA MANDIRI | KALIMANTAN BARAT | KNRM | KENARI MILL | | 2025 | 2026 | HGU in progress, RaCP in progress | |
|--------------------------------|--------------------------------------|------------------|------|----------------------|-------|------|------|--|--------------------------------------|
| 16.1 | PT BANGUN NUSA MANDIRI | KALIMANTAN BARAT | GHRE | GAHARU ESTATE | 1,886 | 2025 | 2026 | | |
| 16.2 | PT BANGUN NUSA MANDIRI | KALIMANTAN BARAT | KNRE | KENARI ESTATE | 3,132 | 2025 | 2026 | | |
| 16.3 | PT BANGUN NUSA MANDIRI - (PLASMA) | KALIMANTAN BARAT | GHRA | GAHARU PLASMA | 557 | 2025 | 2027 | Land title (SHM/HGU) in progress, RaCP in progress | |
| 16.4 | PT BANGUN NUSA MANDIRI - (PLASMA) | KALIMANTAN BARAT | KNRA | KENARI PLASMA | 52 | 2025 | 2027 | | |
| 17 | PT KRUING LESTARI JAYA | KALIMANTAN TIMUR | SPKM | SUNGAI PERAK MILL | | 2024 | 2025 | HCV/HCS Study in progress, RaCP in progress | |
| 17.1 | PT KRUING LESTARI JAYA | KALIMANTAN TIMUR | SPKE | SUNGAI PERAK ESTATE | 2,810 | 2024 | 2025 | | |
| 17.2 | PT KRUING LESTARI JAYA | KALIMANTAN TIMUR | SBAE | SUNGAI BASUNG ESTATE | 2,810 | 2024 | 2025 | | |
| 17.3 | PT KRUING LESTARI JAYA | KALIMANTAN TIMUR | SPIE | SUNGAI PIKAN ESTATE | 2,351 | 2024 | 2025 | | |
| 17.4 | PT KRUING LESTARI JAYA | KALIMANTAN TIMUR | SPLE | SUNGAI PILOS ESTATE | 3,361 | 2024 | 2025 | | |
| 17.5 | PT KRUING LESTARI JAYA | KALIMANTAN TIMUR | SPIA | SUNGAI PIKAN PLASMA | 2,266 | 2024 | 2026 | | |
| 17.6 | PT HARAPAN RIMBA RAYA | KALIMANTAN TIMUR | STHA | SUNGAI TOHAN PLASMA | 1,773 | 2024 | 2026 | HCV/HCS Study in progress, RaCP in progress | |
| 18 | PT HARAPAN RIMBA RAYA | KALIMANTAN TIMUR | SKDM | SUNGAI KEDANG MILL | | 2024 | 2025 | | |
| 18.1 | PT HARAPAN RIMBA RAYA | KALIMANTAN TIMUR | SKDE | SUNGAI KEDANG ESTATE | 3,338 | 2024 | 2025 | | |
| 18.2 | PT HARAPAN RIMBA RAYA | KALIMANTAN TIMUR | STHE | SUNGAI TOHAN ESTATE | 3,597 | 2024 | 2025 | | |
| 18.3 | PT HARAPAN RIMBA RAYA | KALIMANTAN TIMUR | KPHE | KEDANG PAHU ESTATE | 1,928 | 2024 | 2025 | | |
| 18.4 | PT RIMBARAYA TAMAJAYA | KALIMANTAN TIMUR | SPAE | SUNGAI PAHU ESTATE | 2,803 | 2024 | 2025 | | |
| 18.5 | PT RIMBARAYA TAMAJAYA | KALIMANTAN TIMUR | SPAA | SUNGAI PAHU PLASMA | 568 | 2024 | 2026 | HCV/HCS Study in progress, RaCP in progress | |
| SUPPLY BASE OF CERTIFIED MILLS | | | | | | | | | |
| 1 | PT CAHAYA NUSA GEMILANG | KALIMANTAN BARAT | KNNE | KENANGA ESTATE | 2,618 | 2024 | 2026 | | RaCP in progress |
| 2 | PT KENCANA GRAHA PERMAI | KALIMANTAN BARAT | DLME | DELIMA ESTATE | 1,857 | 2024 | 2024 | | RaCP in progress |
| 3 | PT SATYA KISMA USAHA | JAMBI | BGDE | BATANG GADING ESTATE | 1,917 | 2023 | 2025 | | HGU in progress, RaCP in progress |
| 4 | PT FORESTA LESTARI DWIKARYA (PLASMA) | BANGKA BELITUNG | TRSA | TANJUNG RUSA KKPA | 497 | 2024 | 2026 | | RaCP in progress |

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|----|---|--------------------|------|-----------------------------|-------|------|------|---|
| 5 | PT DJUANDA SAWIT LESTARI (PLASMA) | SUMATERA SELATAN | PNDA | PENDAWA KKPA | 1,796 | 2024 | 2026 | RaCP in progress |
| 6 | PT CAHAYA NUSA GEMILANG (PLASMA) | KALIMANTAN BARAT | KNCA | KENCANA KEMITRAAN | 1,108 | 2024 | 2026 | HGU Plasma in progress, RaCP in progress |
| 7 | PT CAHAYA NUSA GEMILANG (PLASMA) | KALIMANTAN BARAT | KNNA | KENANGA KEMITRAAN | 439 | 2024 | 2026 | HGU Plasma in progress, RaCP in progress |
| 8 | PT SATYA KISMA USAHA | KALIMANTAN TENGAH | MSAE | MEDANG SARI ESTATE | 2,436 | 2025 | 2027 | HGU & RaCP in progress |
| 9 | PT SATYA KISMA USAHA (PLASMA) | JAMBI | KILA | KILIS KKPA | 939 | 2024 | 2026 | HGU & RaCP in progress |
| 10 | PT PALMINDO BILITON BERJAYA | BANGKA BELITUNG | TSWE | TANJUNG SAWIT ESTATE | 2,634 | 2024 | 2026 | HCV/HCS Study in progress |
| 11 | PT PALMINDO BILITON BERJAYA (PLASMA) | BANGKA BELITUNG | TSWA | TANJUNG SAWIT PLASMA | 676 | 2024 | 2026 | HCV/HCS Study in progress |
| 12 | PT RAMAJAYA PRAMUKTI (PLASMA) | RIAU | RRMA | RAMARAMA KKPA | 760 | 2024 | 2026 | Land title (SHM) in progress |
| 13 | PT SAWITAKARYA MANUNGGUL (PLASMA) | KALIMANTAN SELATAN | SKPA | SUNGAI KUPANG KKPA | 3,859 | 2024 | 2025 | Land title (SHM) in progress |
| 14 | PT TAPIAN NADENGGAN (PLASMA) | KALIMANTAN TIMUR | JLYA | JAK LUAY KKPA | 2,980 | 2024 | 2026 | RaCP in progress |
| 15 | PT TAPIAN NADENGGAN (PLASMA) | KALIMANTAN TIMUR | BSRA | BUKIT SUBUR KKPA | 712 | 2024 | 2026 | RaCP in progress |
| 16 | PT MEGANUSA INTI SAWIT (PLASMA) | RIAU | KSJA | MANDIAN JAYA PLASMA | 405 | 2022 | 2022 | Certified in 2022 |
| 17 | PT BUANA WIRALESTARI MAS (PLASMA) | RIAU | BRDA | BERKAT RIDHO KKPA | 740 | 2023 | 2025 | Land title (SHM) in progress |
| 18 | PT IVO MAS TUNGGAL (PLASMA) | RIAU | SKJA | KANDIS SEJAHTERA KKPA | 418 | 2023 | 2025 | Land title (SHM) in progress |
| 19 | PT IVO MAS TUNGGAL (PLASMA) | RIAU | KSBA | SWADAYA MAS BERSAMA KKPA | 451 | 2023 | 2025 | Land title (SHM) in progress |
| 20 | PT RAMAJAYA PRAMUKTI (PLASMA) | RIAU | PRSA | PRODUSEN RAMA SAWIT KKPA | 175 | 2023 | 2025 | Land title (SHM) in progress |
| 21 | PT AGROLESTARI SUBUR SEJAHTERA | BANGKA BELITUNG | BPAE | BUKIT PERMAI ESTATE | 3,151 | 2024 | 2026 | HCV/HCS Study in progress |
| 22 | PT AGROLESTARI HIJAU SENTOSA | BANGKA BELITUNG | BLSE | BUKIT LESTARI ESTATE | 664 | 2024 | 2026 | HCV/HCS Study in progress |
| 23 | PT MITRA NUSA PERMATA | KALIMANTAN SELATAN | SMGE | SUNGAI MANUNGGUL ESTATE | 1,175 | 2024 | 2027 | HGU & RaCP in progress |
| 24 | PT KHARISMA RIAU SENTOSA PRIMA | RIAU | KHRE | KHARISMA ESTATE | 345 | 2024 | 2026 | HGU & RaCP in progress |
| 25 | PT KHARISMA RIAU SENTOSA PRIMA (PLASMA) | RIAU | KHRA | KHARISMA PLASMA | 381 | 2024 | 2026 | Land title (SHM) in progress |

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| 26 | PT KRESNA DUTA AGROINDO (PLASMA) | JAMBI | TSRA | TIGA SERUMPUN KKPA | 2,788 | 2024 | 2026 | Land title (SHM) in progress |
| 27 | PT SATYA KISMA USAHA (PLASMA) | JAMBI | BGDA | BATANG GADING KKPA | 1,494 | 2024 | 2025 | Land title (SHM) in progress |

3.3 Details of Nonconformities

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

During this Assessment there were one (1) Critical; two (2) Minor nonconformities and one (1) Opportunity For Improvement raised. The PT Paramitra Internusa Pratama – Belian Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

| Non-conformity | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--------------|---------|-------------------|---------------|---------|---------|--|---------|------|------|--------|-----------------|--|--|--|--|-----------|----|----|----|--|---------|--|---|---|--|-------------------------------------|---|---|---|---------------|-------|----|----|----|--|
| NCR Ref # | 2553263-202409-M1 | Issued Date | | 26 September 2024 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Due Date | 25 December 2024 | Closure Date | | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Indicator & Category (Critical / Minor) | 6.2.3 (Critical/Major) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Statement of Nonconformity: | Unit of certification has not been able to prove that workers' rights to get holidays/rest days are fulfilled. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Requirement Reference: | (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Objective Evidence: | Based on interviews with workers during field visits to electricity-generator operators and water distribution at BLNM, BLNE and TKNE, they stated that they work full time for 1 month and do not have a 1 day break in a week. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <ul style="list-style-type: none">• BLNM worker on behalf of A. K***** *****• BLNE worker on behalf of M*****• TKNE worker on behalf of S***** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Worker Absence | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <table><tr><th rowspan="2">Worker</th><th colspan="3">Month</th><th rowspan="2">Remarks</th></tr><tr><th>June</th><th>July</th><th>August</th></tr><tr><td>A. K***** *****</td><td></td><td></td><td></td><td></td></tr><tr><td>- Mandays</td><td>23</td><td>23</td><td>24</td><td></td></tr><tr><td>- Leave</td><td></td><td>4</td><td>3</td><td></td></tr><tr><td>- Sunday/Holiday (holiday Overtime)</td><td>7</td><td>4</td><td>4</td><td>07.00 - 13.00</td></tr><tr><td>Total</td><td>30</td><td>31</td><td>31</td><td></td></tr></table> | | | | Worker | Month | | | Remarks | June | July | August | A. K***** ***** | | | | | - Mandays | 23 | 23 | 24 | | - Leave | | 4 | 3 | | - Sunday/Holiday (holiday Overtime) | 7 | 4 | 4 | 07.00 - 13.00 | Total | 30 | 31 | 31 | |
| | Worker | Month | | | | Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | June | July | August | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | A. K***** ***** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | - Mandays | 23 | 23 | 24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | - Leave | | 4 | 3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | - Sunday/Holiday (holiday Overtime) | 7 | 4 | 4 | 07.00 - 13.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 30 | 31 | 31 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| <table><tr><th>Worker</th><th colspan="2">Month</th><th>Remarks</th></tr><tr><td></td><td></td><td></td><td></td></tr></table> | | | | Worker | Month | | Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Worker | Month | | Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | | June | July | August | |
| | M***** | | | | |
| | - Mandays | 23 | 27 | 26 | |
| | - Leave | | | | |
| | - Sunday/Holiday (holiday Overtime) | 6 | 4 | 5 | 07.00 - 13.00 |
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| Non-conformity | | | |
|--|---|---------------------|-------------------|
| NCR Ref # | 2553263-202409-M2 | Issued Date | 26 September 2024 |
| Due Date | 25 December 2024 | Closure Date | 21 November 2024 |
| Indicator & Category (Critical / Minor) | 7.12.4 (Critical/Major) | | |
| Statement of Nonconformity: | HCV management plans have not been adequately implemented. | | |
| Requirement Reference: | (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). | | |
| Objective Evidence: | <p>Unit of certification has conducted HCV identification in 2014. Based on the identification results, 3,874.79 Ha of HCV areas were determined, one of which is the riparian areas of Jentu River, Block L52, Division 2, Belian Estate. The certification unit has prepared an HCV management plan for 2023 - 2024. The program includes protection, rehabilitation and mutual agreement with the community.</p> <p>Based on the results of the field visit to the conservation area (HCT) – riparian of Jentu River block L52 Division 2 Belian Estate (referring to the HCV map), obtained information:</p> <ul style="list-style-type: none"> • There are traces of heavy equipment mobilization to the riparian of Jentu River for water hyacinth cleaning activities. The impacts of this mobilization include the opening of HCV areas followed by damage to vegetation in the area. • There are fishing activities by local residents indicated by the presence of several traces of burning activities by fishing groups in the area. In addition, cooking equipment was found stored in the area. This indicates that these activities have been carried out continuously. <p>Based on these facts, it can be concluded that this is not in accordance with the SOP for HCV Management and Monitoring (SOP/SMART/BCOS-EHSD/SADV/I/002) dated 1 July 2014 and the management plan that has been established.</p> | | |
| Corrections: | On 30 September 2024, Deputy CEO7, VPA, Regional Controller (RC), Estate Manager TNKE, Estate Manager BLNE and SPO Region conducted internal meetings with Nature & Biodiversity Department. Through the meeting concluded the action plan to recovering the issues as follows: | | |

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| | <ol style="list-style-type: none"> 1. Planting 128 local trees that resistant in swamp area (<i>Shorea belangiran</i>) to recover the damage vegetation. Nurseries located in BLNE. 2. Having a participative agreement with village leader and customary leader of Sentabai Village to conduct a mutual conservation management in Jentu River on 30 October 2024. 3. Build a security gate in Block K52 BLNE to monitor destruction activity in those HCV areas. 4. Conducting regular monitoring avoid vegetation damage, hunting, burning and fishing using chemical or electrical equipment. Including signboard installation. 5. HCV management plan and implementation will be conducted by SPO/EHS Region and monitoring by Nature & Biodiversity Department in regular basis. |
| Root Cause Analysis: | Cleaning water hyacinth activities in Jentu River conducted without proper communication and planning with respected department in Golden Agri Resources i.e Nature & Biodiversity Department. That caused the activities does not align with the SOP for HCV Management and Monitoring. |
| Corrective Actions: | <ol style="list-style-type: none"> 1. Dissemination on mutual conservation management in Jentu River that agreed with village leader on 30 October 2024 to the local communities especially the fisherman. 2. Conducting regular monitoring by security team. 3. Restricting access into the HCV areas (Jentu River) via the company's entrance. 4. Annual evaluation of record of monitoring and management of HCV area by SPO/EHS Region |
| Assessment Conclusion: | <p>During this assessment, auditor has verified the CAP effectivity supported by evidence as follows:</p> <ol style="list-style-type: none"> 1. Sighted the picture and videos of planting local tree in damage vegetation. 2. Sighted the mutual agreement between the company representatives and village leader/customary leader of Sentabai Village on 30 October 2024. 3. Sighted the photo and video of security gate and signboard installation in Block K52 BLNE. Including the schedule of HCV patrol and daily report of HCV patrol. 4. Sighted the HCV management and monitoring implementation report 2024 that prepared by SPO/EHS Region and monitoring by Nature & Biodiversity Department in regular basis. <p>Based on document verification above, this noncompliance satisfactorily closed.</p> |

| Non-conformity | | | |
|--|-------------------|---------------------|-------------------|
| NCR Ref # | 2553263-202409-N1 | Issued Date | 26 September 2024 |
| Due Date | Until next ASA | Closure Date | - |
| Indicator & Category (Critical / Minor) | 2.2.2 (Minor) | | |

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| Statement of Nonconformity: | Not all contracts with third parties were disclosed during this assessment. |
| Requirement Reference: | All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party. |
| Objective Evidence: | The certification unit has not been able to show complete documentation of contracts with third parties. For example, sales contracts/cooperation for processing FFB with suppliers, transportation of FFB with local contractors, and transportation contracts for CPO/PK. |
| Corrections: | SPO assistant collected the actual list of contractors in a monthly basis. |
| Root Cause Analysis: | Found some individual and local corporate working-agreement reported to SPO Officer. It caused not all contractor updated in actual list of contractors. |
| Corrective Actions: | Unit manager and head clerk informed if any new contractor to SPO Officer in a monthly basis. |
| Assessment Conclusion: | CAP approved. The CAP effectivity will be verified in the next ASA. |

| Non-conformity | | | |
|--|---|---------------------|-------------------|
| NCR Ref # | 2553263-202409-N2 | Issued Date | 26 September 2024 |
| Due Date | Until next ASA | Closure Date | - |
| Indicator & Category (Critical / Minor) | 3.7.3 (Minor) | | |
| Statement of Nonconformity: | Unit of certification has not been able to demonstrate the training evidence for personnel responsible for implementing the SCC. | | |
| Requirement Reference: | 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. | | |
| Objective Evidence: | <p>Until this audit was completed, unit of certification had not been able to demonstrate the training evidence for personnel responsible for implementing the SCC.</p> <p>Based on interviews with FFB receiving officers (security and weighbridge operators) and the production clerk, they do not yet have adequate understanding regarding the implementation of SCC.</p> | | |
| Corrections: | <p>Unit of certification conducted RSPO SCCS training as follows:</p> <ol style="list-style-type: none"> 24 September 2024, attended by Mill Manager, head clerk, head assistant, laboratory staff, dispatch supervisor, laboratory analyst, weighbridge operator, sortation operator, production clerk and security officer. This training facilitated by certification head from Operational Sustainability Division. 5 November 2024, attended by head clerk, head assistant, laboratory staff, dispatch supervisor, laboratory analyst, weighbridge operator, sortation | | |

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| | <p>operator, production clerk and security officer. This training facilitated by mill manager and head clerk.</p> <p>3. Training evaluation through the post-test training. Evaluation result:</p> <table><tr><td><i>Score</i></td><td><i>0-20</i></td><td><i>30-50</i></td><td><i>60-80</i></td><td><i>90-100</i></td><td><i>Total</i></td></tr><tr><td><i>Participants</i></td><td><i>0</i></td><td><i>0</i></td><td><i>5</i></td><td><i>4</i></td><td><i>9</i></td></tr></table> <p>Through the evaluation above it can be concluded that the PIC has been aware related to the RSPO SCCS implementation.</p> | <i>Score</i> | <i>0-20</i> | <i>30-50</i> | <i>60-80</i> | <i>90-100</i> | <i>Total</i> | <i>Participants</i> | <i>0</i> | <i>0</i> | <i>5</i> | <i>4</i> | <i>9</i> |
| <i>Score</i> | <i>0-20</i> | <i>30-50</i> | <i>60-80</i> | <i>90-100</i> | <i>Total</i> | | | | | | | | |
| <i>Participants</i> | <i>0</i> | <i>0</i> | <i>5</i> | <i>4</i> | <i>9</i> | | | | | | | | |
| Root Cause Analysis: | There was a change in personnel for production clerks, dispatch, grading and weighbridge operators and head clerk as well. It caused the lack of awareness related to RSPO SCCS implementation. | | | | | | | | | | | | |
| Corrective Actions: | <ul style="list-style-type: none">• Mill manager schedules a knowledge transfer session if any PIC replacement.• OSDV conducts annual online refreshment training for head clerk and SPO Officer.• Assessment of the effectiveness of PIC understanding is carried out through Internal Sustainability Verification (ISV) activities carried out annually by the OSDV team.• Conduct refreshment training for PICs who directly handle the implementation of the supply chain routinely every 6 months. | | | | | | | | | | | | |
| Assessment Conclusion: | <p>CAP approved.</p> <p>The CAP effectivity will be verified in the next ASA.</p> | | | | | | | | | | | | |

| Opportunity for Improvements | | | | | | | | |
|------------------------------|---|---------|-------|---------|--|--|--|--|
| OFI # | Description | | | | | | | |
| OFI 1 | <u>Indicator 6.2.3:</u> <i>According to the Global Appeal Team decision through their email on 30/10/2024 on NC Reference No 2553263-202409-M1, this NCR downgraded this Critical/Major nonconformity into Opportunity for Improvement (OFI) as below:</i> | | | | | | | |
| | Based on interviews with workers during field visits to electricity-generator operators and water distribution at BLNM, BLNE and TKNE, they stated that they work full time for 1 month and do not have a 1 day break in a week. | | | | | | | |
| | <ul style="list-style-type: none">• BLNM worker on behalf of A. K***** *****• BLNE worker on behalf of M*****• TKNE worker on behalf of S***** | | | | | | | |
| | Worker Absence | | | | | | | |
| | <table><tr><th>Worker</th><th>Month</th><th>Remarks</th></tr><tr><td></td><td></td><td></td></tr></table> | Worker | Month | Remarks | | | | |
| Worker | Month | Remarks | | | | | | |
| | | | | | | | | |

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| | June | July | August | |
|-------------------------------------|-----------|-----------|-----------|---------------|
| A. K***** ***** | | | | |
| - Mandays | 23 | 23 | 24 | |
| - Leave | | 4 | 3 | |
| - Sunday/Holiday (holiday Overtime) | 7 | 4 | 4 | 07.00 - 13.00 |
| Total | 30 | 31 | 31 | |

| Worker | Month | | | Remarks |
|-------------------------------------|-----------|-----------|-----------|---------------|
| | June | July | August | |
| M***** | | | | |
| - Mandays | 23 | 27 | 26 | |
| - Leave | | | | |
| - Sunday/Holiday (holiday Overtime) | 6 | 4 | 5 | 07.00 - 13.00 |
| Total | 29 | 31 | 31 | |

| Worker | Month | | | Remarks |
|-------------------------------------|-----------|-----------|-----------|---------------|
| | June | July | August | |
| S***** | | | | |
| - Mandays | 23 | 27 | 26 | |
| - Leave | | | | |
| - Sunday/Holiday (holiday Overtime) | 7 | 4 | 5 | 07.00 - 13.00 |
| Total | 30 | 31 | 31 | |

Based on the absence verification (fingerprint) above, it can be seen that the worker worked for 30-31 days in one full month without a break/holiday of 1 day a week.

Based on PP no. 35/2021 clause 22 stated:

Employers who employ Workers/Laborers during working hours as referred to in Article 21 paragraph (2) are required to provide weekly rest time to Workers/Laborers including:

- c. Weekly rest of 1 (one) day for 6 (six) working days in 1 (one) week; or
- d. Weekly rest of 2 (two) days for 5 (five) working days in 1 (one) week.

Based on Collective Labour Agreement/PKB PT Paramitra Internusa Pratama period 2022 – 2024

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|--|---|
| | CHAPTER IV; Working Days and Working Hours |
| | <ol style="list-style-type: none"> Working days in the company are set at 6 working days a week Working days are set from Monday to Saturday and Sunday is a rest day. |

| Positive Findings | |
|-------------------|-------------|
| PF # | Description |
| PF 1 | - |

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

| Previous Audit Critical (Major) Non-conformity | | | |
|--|--|--------------|------------------|
| NCR Ref # | 2284908-202212-M1 | Issued Date | 10 December 2022 |
| Due Date | 9 December 2023 | Closure Date | 30 October 2023 |
| Indicator & Category (Critical / Minor) | Indicator 7.12.8 (Critical) | | |
| Statement of Nonconformity: | According to the Area Statement, there are some areas which cleared prior to HCV Assessment 2011. However, the unit of certification cannot provide evidence to demonstrate that the HCV compensation project plan against Final Conservation Liability and Environmental Remediation Plan has been developed and accepted by the RSPO Compensation Panel. | | |
| Requirement Reference: | (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies. - Critical (Major) compliance - | | |
| Objective Evidence: | Unit of certification, PT Paramitra Internusa Pratama, as subsidiary of Golden Agri Resources (GAR) has demonstrated the updated evidence of Remediation and Compensation Procedures (RaCP) processes as below: <ul style="list-style-type: none"> - 29/8/2014: GAR submitted liability data and zero liability disclosure to RSPO for all subsidiaries, including PT Paramitra Internusa Pratama. - 15/12/2015: Submission of Land Use Change Analysis (LUCA) for GAR concessions. There are 12 companies were submitted, including PT Paramitra Internusa Pratama. - 19/04/2022: RSPO send LUCA status of PT Paramitra Internusa Pratama, where the LUCA status is Pass with Final Conservation Liability is 1,974.83 Ha and Environmental Remediation Area is 92.5 Ha. - 29/07/2022: Submission of Concept Note Batch 2. - 08/11/2022: Respond from RSPO against submission of the concept note by GAR Batch 2. - 14/11/2022: Reply from GAR to RSPO against result of concept note review. | | |

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| | - 07/12/2022: GAR asking for update of Concept Note review. |
| Corrections: | The company has inquired with the RSPO Compensation Panel regarding the review process of the Concept Note on 7 December 2022, and was replied by Siti Joanni (RSPO) who informed that: "the secretariat is following up for another panel feedback related to your concerns as well. They will prompt the company once they receive a complete quorum of the panel's feedback". The company was informed that once the RSPO secretariat has received a complete quorum of the panel's feedback, they will prompt the company with an update. |
| Root Cause Analysis: | <p>The company has followed the sustainable palm oil production standards set by the Roundtable on Sustainable Palm Oil (RSPO) by submitting its RaCP Concept Note on 29 July 2022. The Concept Note serves as an introduction of the company's plan for Remediation and Compensation (RaCP) in its palm oil production process.</p> <p>Since the submission, the company has been working with the RSPO to receive feedback and make any necessary resubmissions to ensure that the Concept Note meets all the requirements and standards set by the RSPO. However, as of the initial certification assessment, the Concept Note has not yet been approved by the RSPO Compensation Panel or Secretariat.</p> <p>According to the 2015 RaCP Procedure, the next step in the RaCP process is the preparation of a Remediation and Compensation Proposal, which can only be carried out after the Concept Note has been approved. The proposal outlines the specific actions and measures the company plans to take to address any environmental or social impacts from its palm oil production and compensate for them accordingly.</p> |
| Corrective Actions: | <p>The company is taking a proactive approach to monitor the progress of its Remediation and Compensation Plan (RaCP) of PT Paramitra Internusa Pratama. To ensure that the RaCP is moving forward as planned, the company checks on its progress on monthly basis. This helps the company to stay updated on the progress and make any necessary adjustments to the RaCP, if needed.</p> <p>In addition to regular progress monitoring, the company also maintains regular communication with the RSPO to keep updated on the latest status of the RaCP, by emails every two weeks.</p> <p>The company committed to inform the CB, BSI, if and when the Remediation and Compensation Proposal is approved by the RSPO Compensation Panel or Secretariat.</p> |
| Assessment Conclusion: | <p>During NCR close out verification on 30 October 2023, the parent company of PT Paramitra Internusa Pratama has provided evidence of Compensation Plan Evaluation Report Golden Agri-Resources (100961100000) with Final Evaluation Score is Satisfactory, dated 19 October 2023. The document mentioned name of subsidiary(ies)/management units relevant to the compensation and remediation liability, that are:</p> <ol style="list-style-type: none"> 1. PT Kencana Graha Permai (KGP) 2. PT Buana Artha Sejahtera (BAS) 3. PT Tapan Nadenggan Kalteng 3 (TN Kalteng 3) 4. PT Tapan Nadenggan Kaltim 2 (TN Kaltim 2) 5. PT Bumi Sawit Permai (BSP) 6. PT Kresna Duta Agroindo (KDA) 7. PT Sumber Indah Perkasa (SIP) 8. PT Satya Kisma Usaha Jambi (SKU Jambi) |

| | |
|---|---|
| | <p>9. PT Paramitra Internusa Pratama (PT PIP)</p> <p>10. PT Agro Lestari Sentosa (PT ALS)</p> <p>Total Final Conservation Liability: 4,727.69 Ha</p> <p>Total area requiring environmental remediation:</p> <ul style="list-style-type: none"> • Riparian zone : 1,456.76 Ha • Peat land : 2.92 Ha • Steep slope : 84.26 Ha <p>History of correspondence between GAR and RSPO after 7 December 2022 are as follow:</p> <ul style="list-style-type: none"> - Concept Note (Annex 7) PT PIP – Belian Mill has been approved (endorsed) on 8 February 2023 - Proposal Compensation Plan (Annex 8) PT PIP has been submitted on 28 March 2023 - Revised Proposal of Compensation Plan (Annex 8) PT PIP – Belian Mill has been submitted on 1 September 2023 - Update from RSPO on 12 September 2023, stated that the independent evaluator is currently reviewing the compensation plan. - On 18 September 2023: RSPO sent feedback from the independent evaluator. - On 29 September 2023: GAR resubmit the revised RaCP Annex 8 of GAR – Batch 1 & Batch 2 following the feedback from the evaluator shared on 18 September 2023. Responded by RSPO on 2 October 2023. - On 9 October 2023: RSPO sent feedback from evaluator that requiring further clarification about the budget. - On 12 October 2023: GAR give explanation to RSPO regarding the budget. Responded by RSPO on 12 October 2023 stating that RSPO will forward the information along with the clarification note to the Evaluator in order for the evaluator to continue the evaluation process. - Update from RSPO on 20 October 2023, officially inform that the Remediation & Compensation Plan for GAR Batch 1 & 2 has achieved Satisfactory results, and thus, the RaCP process for the units involved in this project is now completed. - PT Paramitra Internusa Pratama and its parent company has demonstrated consistent correction and corrective action planned. Critical NC is closed satisfactorily. |
| Effectiveness Closure (for previous audit closed Critical NC): | During this assessment, the issue has been solved by RSPO Secretariat. |

| Previous Audit Opportunity for Improvement | |
|--|--|
| OFI# | Description |
| OFI 1 | <p>OFI Statement:</p> <p>Indicator 2.1.2</p> <p>PT Paramitra Internusa Pratama has coordinated with the DPPLH Kapuas Hulu Regency to combine environmental approvals of biogas plant with the previous AMDAL and has received a directive letter No.660/47/DPPLH/TL dated 13 June 2022, and communication has been made with third parties for the</p> |

| | |
|--------------|---|
| | <p>implementation of environmental impact analysis. Expected to speed up the process of ANDAL and RKL-RPL documents addendum with type A categories in accordance with statutory regulations.</p> <p>Verification / Follow-up actions:</p> <p>Unit of certification has provided information to show the system top ensuring legal compliance has been reviewed regularly. This evaluation running by SPO officer in each unit mill/estate.</p> |
| OFI 2 | <p>OFI Statement:</p> <p>Indicator 6.5.3</p> <p>PT Paramitra Internusa Pratama has conducted assessment of the needs of new mothers and has implemented the results, among others, by providing lactation rooms for breastfeeding mothers and providing time/opportunity to breastfeed their children. Equal understanding is needed regarding the needs of new mothers.</p> <p>Verification / Follow-up actions:</p> <p>Based on interview with random workers, labour union representative and gender committee obtain information that unit of certification that the dissemination related to the new mothers needs has been held properly. Women workers can described their reproduction rights such as menstruation leave, pregnancy testing, maternity leave and breastfeeding time as needed.</p> |

3.3.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Critical / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|---|--------------------------------|---------------|-------------------|----------------------------|
| Initial Assessment (Stage 2) | | | | |
| 2284908-202212-M1 | Critical | 7.12.8 | 10 December 2022 | 30 October 2023 |
| Annual Surveillance Assessment - 1 (ASA-1) | | | | |
| 2553263-202409-M2 | Critical | 7.12.4 | 26 September 2024 | Closed on 21 November 2024 |
| 2553263-202409-N1 | Minor | 2.2.2 | 26 September 2024 | Open until next ASA |
| 2553263-202409-N2 | Minor | 3.7.3 | 26 September 2024 | Open until next ASA |

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Paramitra Internusa Pratama – Belian Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were

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interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

| Stakeholders contacted | | |
|---|---|--|
| Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities) | Stakeholder name / organization | Means of communication (e.g. face to face interview, email, phone interview, comment from public notice) |
| Government Department | Environmental Agency of Kapuas Hulu Regency | Phone interview |
| Government Department | Plantation Agency of Kapuas Hulu Regency | Phone interview |
| Government Department | Labour Agency of Kapuas Hulu Regency | Phone interview |
| Village Head/Representative | Nanga Lemedak and Pelanjau | Face to face interview |
| Customary Leader | Customary Leader of Dayaknese (Ketua Dewan Adat Dayak and Temenggung Adat Dayak Subdistrict of Semitau) | Face to face interview |
| NGO | World Wildlife Fund | Phone interview |
| Board of Cooperative | Koperasi Mitra Puyang Gana | Face to face interview |
| Local contractor | UD Sumber Rejeki | Face to face interview |
| Local contractor | CV Lintas Batas Sejahtera | Face to face interview |
| Gender Committee | Gender Committee representative from each unit. | Face to face interview |
| Labour Union | Labour Union representative from each unit. | Face to face interview |
| Worker Cooperative | Worker Cooperative representative from each unit. | Face to face interview |

| Stakeholders comment | |
|----------------------|---|
| #1 | <p>Feedbacks: Village Head/representative from Nanga Lemedak, Pelanjau, and Sekedau Village</p> <ul style="list-style-type: none"> Unit of certification have a strong relationship with village leader/representatives. There is no land conflict existed, however there is some enclave area inside the unit of certification's concession. Unit of certification deliver their cares to the local communities through CSR program. CSR covering education program, medical check for older people, flood donation and many communities' helps. <p>Audit Team verification and response: No negative issue needs to further observation.</p> |
| #2 | <p>Feedbacks: Customary Leader of Dayaknese (Ketua Dewan Adat Dayak and Temenggung Adat Dayak Subdistrict of Semitau)</p> |

| | |
|----|--|
| | <ul style="list-style-type: none"> Unit of certification have a strong relationship with customary institution. They support annual agenda of customary leader. There is no land conflict exist until this assessment. Land acquisition process through "Simpak Beliang" process has been done. |
| | Audit Team verification and response: No negative issue needs to further observation. |
| #3 | Feedbacks: NGO - WWF There is negative issues obtained. Unit of certification should maintain their relationship with local communities, customary leader, and other stakeholder to be sustainable. |
| | Audit Team verification and response: No negative issue needs to further observation. |
| #4 | Feedback: Koperasi Mitra Puyang Gana – Mr. Riki Darmawan (Sekretaris) <ul style="list-style-type: none"> Koperasi Perkebunan Kelapa Sawit Mitra Puyang Gana (KOPSA MPG) covers area of five village, consist of Tua Abang, Sekedau, Sungai Putat, Seberuang and Lemedak Village. The KOPSA MPG is Scheme Smallholder of PT Paramitra Internusa Pratama. Oil palm plantation is fully managed as Belian Plasma (BLNA), under control of Tengawang Estate Manager. The Scheme Smallholder area consists of Phase 1: 1,023 ha, with 528 member households, and Phase 2: 829 ha, with 543 member households, totaling 1,852 hectares of Scheme Smallholder plantation of Belian Plasma (BLNA). Phase 1 includes planting years from 2010 to 2016, while Phase 2 consists of planting in 2017. Weekly meetings are held every Wednesday between the Cooperative management, the Scheme Smallholder Assistant, and other Company representatives to follow up on field visits. The RAT (Annual General Meeting) is held regularly each year, with the most recent one conducted on 27 June 2024. The Company has provided various training sessions to the Cooperative, including training on taxes and Cooperative management. Knowledge sharing on good agricultural practices is conducted during field visits. FFB sales payment to Scheme Smallholder members is carried out monthly. The process of obtaining BPD PKS assistance funds for fertilizer and agrochemical costs is currently underway. <p>The Cooperative management hopes that as FFB production increases, the monthly FFB sales payment value will also rise.</p> |
| | Audit Team verification and response: The board's hope for an increase in FFB sales payment has been communicated to company management. This will be verified during the next surveillance audit. There is no other issue that need further verification. |
| #5 | Feedbacks: Local Contractor - UD Sumber Rejeki (Mrs. Harwanti) and Toko Sinar <ul style="list-style-type: none"> UD Sumber Rejeki and Toko Sinar has been working with the Company since 2010 to serve the sale of basic necessities for the office, management and staff housing. There is no special contract, due to buying and selling process is carried out independently depending on the needs. Payment is made every 2 weeks. So far there have been no significant problems related to payment. |
| | Audit Team verification and response: |

| | |
|-----------|---|
| | There is no issue that need further verification. |
| #6 | <p>Feedbacks: Local Contractor - CV Lintas Batas Sejahtera (Mr. Edy Kasyim)</p> <ul style="list-style-type: none"> CV Lintas Batas Sejahtera is a heavy equipment rental contractor for excavators of various sizes, with a total of 9 units operating at PT PIP. CV Lintas Batas Sejahtera workers consist of operators, helpers, drivers, supervisors, mechanics and cooks, all of whom have been registered with <i>BPJS Ketenagakerjaan</i> (Social insurance). The fuel used is Industrial Diesel supplied by PT COP. The contractor's hope is that for large contracts, payments can be made every month to maintain the contractor's cash flow. <p>Audit Team verification and response:</p> <p>The contractor's hope for an increase in payment system has been communicated to company management. This will be verified during the next surveillance audit.</p> <p>There is no other issue that need further verification.</p> |
| #7 | <p>Feedbacks: Environmental Agency of Kapuas Hulu Regency</p> <ul style="list-style-type: none"> Communication is well established Mandatory reporting (RKL/RPL Environmental Management Report, LB3 Management, Land Application Liquid Waste Utilization Reports) have been submitted accordingly and on time Until now there are no reports of stakeholders related to pollution and environmental impact by PT Paramitra Internusa Pratama. Peat management has done well by PT Paramitra Internusa Pratama The area of PT Paramitra Internusa Pratama is not in the forest area. So far there are no formally complaints from other parties related to the existence of PT PIP areas in the forest area. <p>At this time PT PIP is applying for a change environment licensing, this relation to the will the end of the hazardous waste and permits utilization of permits liquid waste.</p> <p>Audit Team verification and response:</p> <p>No negative issue needs to further observation.</p> |
| #8 | <p>Feedbacks: Labour Agency of Kapuas Hulu Regency</p> <ul style="list-style-type: none"> The mandatory employment report for the 2023 period has been reported online on time The report on the use of PKWT workers has been submitted in June 2024, but the temporary work agreement document must be corrected regarding the type of work that is clearer. Until now there have been no industrial relations cases There was a report of a work accident at Belian Mill in early 2024 Submission for ratification/amandement of the Collective Labor Agreement (PKB) for the 2024-2026 period on August 1, 2024. <p>Audit Team verification and response:</p> <p>No negative issue needs to further observation.</p> |
| #9 | <p>Feedbacks: Plantation Agency of Kapuas Hulu Regency</p> <ul style="list-style-type: none"> Communication has been well established until now There are no complaints from local community related to plantation activities at PT PIP The company has fulfilled the obligation to the community plantation development Plasma Koperasi Mitra Puyang Gana Business assessment plantations have been implemented on October 14, 2023 with class I (good) category <p>Audit Team verification and response:</p> |

| | |
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| | No negative issue needs to further observation. |
| #10 | <p>Feedbacks: Gender Committee</p> <ul style="list-style-type: none"> Each gender committee has its own organizational structure in each estate and mill, consisting of a chairperson, vice chairperson and secretary. Each gender committee has a program, where the main program is to conduct socialization related to sexual harassment, verbal harassment, domestic violence, violence against children, etc. The company is committed to equal rights for female workers. Until now, there have never been cases of harassment of female workers, discrimination and forced labor practices. The company has respected the reproductive protection of female workers, for example: granting the right to menstrual leave (H1), granting the right to maternity leave (H2) for 3 months. The company has also facilitated the provision of a room for breastfeeding children located in the Childcare Center in each division. <p>Audit Team verification and response: No negative issue needs to further observation.</p> |
| #11 | <p>Feedbacks: Serikat Pekerja/Labour Union</p> <ul style="list-style-type: none"> Each SPM has its own organizational structure in each Estate and Mill, consisting of a chairperson, vice chairperson, secretary and treasurer. Wages are in accordance with the regulations set by the Governor of Kalimantan Barat for the 2024 period. There is no use of underage labor, forced labor practices, human rights violations and discrimination. Employee salary payments are always on time Industrial problems between employees and the company have been resolved. There are no industrial issues that are still under deliberation. <p>Audit Team verification and response: No negative issue needs to further observation.</p> |
| #12 | <p>Feedbacks: Worker Cooperative</p> <ul style="list-style-type: none"> The company has an employee cooperative engaged in savings and loan business. Each estate and mill has its own cooperative management. Employees who are members of the cooperative can borrow a maximum of 5 million rupiah. Employee cooperatives are very helpful for employees. There are no bad credit problems. Accountability meetings and SHU distribution have been carried out regularly every year. <p>Audit Team verification and response: No negative issue needs to further observation.</p> |

List of land owner / user contacted

| Name | Years of ownership / used | Land area (ha) | Agreement (Yes / No) | Agreement base on FPIC (Yes/No) | Compliance on the agreement terms and conditions |
|------------------|---------------------------|----------------|----------------------|---------------------------------|--|
| Hilarius Kintang | 2014 | 2.3 | Yes | Yes | Complied |
| Yosep Dodi | 2013 | 2.00 | Yes | Yes | Complied |

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| Previous land owner / user comment | |
|------------------------------------|---|
| #1 | Feedback: Hilarius Kintang from Kenepai Village He handed over 2.3 Ha of land located in Nanga Lemedak in 2014. The handover was carried out voluntarily and witnessed by customary leaders and the village head. |
| | Audit Team verification and response: There is no issue on this, no further verification needed. |
| #2 | Feedback: Yosep Dodi from Nanga Lemedak Village He handed over 2.00 hectares of land located in Nanga Lemedak Village in 2013. The handover was carried out voluntarily and witnessed by customary leaders and the village head. |
| | Audit Team verification and response: There is no issue on this, no further verification needed. |

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

| The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Paramitra Internusa Pratama - Belian Mill has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT Paramitra Internusa Pratama - Belian Mill is remain certified. | |
|--|---|
| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Andi Pratama Pasaribu | Name: Yahya Mustakim |
| Company Name: BSI Services Malaysia Sdn. Bhd. | Company Name: PT Paramitra Internusa Pratama |
| Title: Team Leader | Title: Sustainability Department Head |
| Signature:  | Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>  |
| Date: 21 November 2024 | Date: 21 November 2024 |

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Appendix A: Summary of Findings

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships. | | | |
| Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. | | | |
| 1.1.1 | (C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance - | According to document "Daftar Informasi Untuk Stakeholder – F/SMART/UMUM/SADV/004/003)" listed the accessible document for stakeholders as follows: <ol style="list-style-type: none"> 1. Total employee and its minimum wage. 2. Data of taxpayer ID number and land/building tax. 3. Receipt payment of local tax/retribution. 4. Environmental document. 5. Company establishment deeds and its amendments, hectare statement, production data and application data. 6. Land title evidence 7. High Conservation Value (HCV) report 8. Social Impact Assessment (SIA) report 9. Report of community empowerment program 10. Occupational Health and Safety (OHS/P2K3) committee report 11. Continuous improvement report 12. Human Rights Policy in GSEP 13. Village participatory mapping 14. Recap of health/worker insurance payment | Complied |

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| | | | |
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| | | 15. Complaint and grievance submission chart 16. Dispute settlement process. All of this document is publicly available. | |
| 1.1.2 | Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance - | The company provide all public document in Bahasa Indonesia. For example, company policy (GSEP) available in public area, estate and mill office and clinic. | Complied |
| 1.1.3 | (C) Records of requests for information and responses are maintained. - Critical (Major) compliance - | PT Paramitra Internusa Pratama maintain records for information and responses title "Buku Catatan Permintaan dan Tanggapan Informasi". Within 2023 - 2024, listed some incoming letter or email from stakeholders. For example, sighted the request information from customary leader on 18/04/2024 related to donation for customary festival. Responded by Estate Manager Tengkawang on 10 May 2024 along with handover the donation. | Complied |
| 1.1.4 | (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance - | PT Paramitra Internusa Pratama refers to communication and consultation procedure under "SOP Komunikasi dan Konsultasi No. SOP/SMART/ UMUM/SADV/I/004" dated 1 July 2014. The document stipulates type of communication: aspiration and suggestion, information for stakeholders, incident report, consultation with internal and external parties. The procedure stipulates upon receiving aspiration/incoming letter, unit head inform related Department max.1 week after correspondence received; Unit Head prepare response plan max.3 weeks after correspondence received; Unit Head send for Top management max. 1 week to obtain guidance and approval. PT Paramitra Internusa Pratama has appointed management official to consult and communicate with stakeholders: <ul style="list-style-type: none"> • Production Controller – PSM 7 appointed Unit Head Belian Mill as a Personnel in Charge of Communication and Consultation to Local | Complied |

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| | | | |
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| | | <p>Communities based on appointment letter No. 01/PC-SPO/VII/2020 dated 10 January 2022.</p> <ul style="list-style-type: none"> Regional Controller Semitau appointed Unit Head Belian Estate as a Personnel in Charge of Communication and Consultation to Local Communities based on appointment letter No. 011/RC-Semitau/08/2019 dated 1 September 2019. Regional Controller Semitau appointed Unit Head Tengawang Estate as a Personnel in Charge of Communication and Consultation to Local Communities based on appointment letter No. 04/RC-RSPO /05/2019 dated 7 May 2019. <p>This document has been communicated to stakeholders, for example:</p> <ul style="list-style-type: none"> Dissemination of GAR Sustainability Policy to the villager of Nanga Seberuan on 5 August 2024. Attended by 25 participants. Dissemination of GAR Sustainability Policy to the workers of Tengawang Estate on 24 – 28 June 2024. Attended by 270 estate workers including field supervisor and office clerk. | |
| 1.1.5 | <p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama demonstrated contact and detailed stakeholder information, latest update August 2024. The list comprises of:</p> <ul style="list-style-type: none"> Government: Semitau District Head, Police Subdistrict Head of Semitau, Military Subdistrict Head of Semitau, Puskesmas Semitau, Manpower Service Kapuas Hulu Regency, Environmental Service Kapuas Hulu Regency, Lands Office Kapuas Hulu Regency. Villages: Nanga Seberuang, Seberuang Kecil, Nanga Lemedang and Tua' Abang, Skedau, Customary leader: <i>Dewan Adat Dayak, Temenggung Adat, Patih Adat</i>, and <i>Kepala Adat</i> from Lemedak, Seberuang Kecil, Seberuang Besar Village. | Complied |

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| | | <ul style="list-style-type: none"> Religion leader: Church Leader of Tua' Abang Village, Seberuang Kecil Village, Seberuang Besar Village and Skedau Village. Worker organization: Labour Union (<i>Serikat Pekerja Mandiri</i>), Gender Committee and <i>Koperasi Karyawan "Berlian Kapuas"</i>. Local contractor: PT. Satrindo Jaya Agropalma, CV Lintas Batas, CV Sinar Bintang, CV Kamal, UD Sumber Rejeki, Meubel Kapuas, Travel Louhan and CV Wira Arta Nusantara. Smallholder Cooperative: KOPSA Mitra Puyang Gana (Belian Plasma) Education: SD Eka Tjipta, SMP Eka Tjipta, SDN 09 Tua' Abang Villlage, SN12 Skedau Village, Universitas Tanjung Pura in Pontianak. NGO: Lingkar Komunitas Sawit (LINKS), World Wildlife Funds/WWF – Kapuas Hulu Landscape, Earth Worm, Fortasbi, Pena Bulu, and Ekologika. Bank: Sinarmas Bank – Sintang Branch. Journalist: Media Pontianak Post, Media Antara Kalbar, Kapuas Post, Ruai TV, Media Tribun Pontianak. | |
| 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. - Minor compliance - | <p>PT Paramitra Internusa Pratama referring to "Kode Etik Golden Agri Resources" signed by Chairman, June 2021. The content of the code of ethical conduct is applicable in upholding integrity for employee, company, business partner, shareholder and community.</p> <ul style="list-style-type: none"> Upholding integrity for employee covers respecting diversity, avoid discrimination, avoid harassment and violence, respect employee privacy, creating safe workplace environment, zero tolerance on illegal substance, and fair industrial relation practices including recruitment. | Complied |

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| | | <ul style="list-style-type: none"> • Upholding integrity for company covers protection of company assets, correct use of technology, responsible use of social media, confidential information, and intellectual asset protection, avoid conflict of interest, working outside and business affiliate activity, financial interest, gift and hospitality regulation. • Upholding integrity for business partner covers provision of safe and high-quality product and service, fair treatment of business partner through fair deal with customer, fair treatment for supplier, government customer, fair competition through antitrust law, ethical sales and marketing, competitor information, prevent bribery and corruption, anti-money laundering, international business activity in dealing with import and export, reviewing economic sanction and boycotting. • Upholding integrity for shareholder covers accurate accounting book-keeping and recording, disclosure of financial report and fraud, management note, stock exchange transaction, insider trading, good corporate governance, communication with shareholders. • Upholding integrity for community explains upholding environmental and social sustainability, political activity, external communication. <p>The document code of ethical conduct including raising concerns through email and telephone number.</p> <p>PT Paramitra Internusa Pratama has disseminated the ethical policy to the respective stakeholders. For example: dissemination of the ethical policy on 05 August 2024 to all contractor in meeting room Regional Controller Office, attended by 12 contractor/representatives.</p> | |
| 1.2.2 | A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. | PT Paramitra Internusa Pratama carried out internal audit against RSPO P&C and operational procedures on annual basis, covering indicator | Complied |

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| | - Minor compliance - | <p>related to code of ethical conduct implementation in company operation and contractor:</p> <ul style="list-style-type: none"> • Certificate holder has had a regular internal audit schedule namely Operation Internal Audit (OIA) for each unit. The recent internal audit was conducted on 03 – 10 May 2024 (Belian Mill); 03 – 15 May 2024 (Tengkawang Estate) and 31 October – 8 November 2024 (Belian Estate). All findings were satisfactorily closed. • Internal audit sustainability for PT PIP that conducted by sustainability department from Jakarta Head Office on 9 – 13 September 2024 to ensure the implementation of sustainability aligned with the procedure. | |
| Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction. | | | |
| Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations. | | | |
| 2.1.1 | (C) The unit of certification complies to relevant regulations. - Critical (Major) compliance - | <p>PT Paramitra Internusa Pratama as unit of certification have already comply with relevant regulations as below:</p> <ul style="list-style-type: none"> • Deed of Establishment: "Akta Pendirian Perseroan Terbatas PT. Paramitra Internusa Pratama No. 05, tanggal 8 June 2006". Approval Ministry of Law and Human Rights Nomor: W7-05304 HT.01.01-TH.2007, dated 10 May 2007. • Changes of Deed: "Berita Acara RUPS Luar Biasa PT Paramitra Internusa Pratama" No. 10, dated 1 Apr 2019. Approval Ministry of Law and Human Rights Nomor: AHU-AH.01.03-0222755, dated 28 April 2019. • Taxpayer Number/NPWP: 02.275.842.9-021.000, registered since 30 August 2006. • Location Permit: | Complied |

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| | | <p>a) "SK Bupati Kapuas Hulu Nomor 14 Tahun 2007" regarding Location Permit PT Paramitra Internusa Pratama for area \pm 20,000 Ha.</p> <p>b) 1st Revision of location permit "SK Bupati Kapuas Hulu Nomor 139 Tahun 2009", dated 12 May 2009 regarding 1st extension permit for area \pm 20,000 Ha.</p> <p>c) 2nd Revision of location permit "SK Bupati Kapuas Hulu Nomor 305 Tahun 2012", dated 12 July 2012 regarding 2nd extension permit for area \pm 20,000 Ha.</p> <ul style="list-style-type: none"> • Environmental Permit / AMDAL/ Izin Lingkungan: refer to "Keputusan Bupati Kapuas Hulu Nomor 289 Tahun 2006", dated 22 December 2006 regarding "Kelayakan Lingkungan Kegiatan Perkebunan Kelapa Sawit PT Paramitra Internusa Pratama" in effective area 12,000 Ha. • Timber Utilization Permit (Izin Pemanfaatan Kayu): "Surat Gubernur Kalimantan Barat Nomor: 522/3457/DISHUT/2008", dated 28 November 2008 regarding Principle Permit of Timber within Non-Forest Designated Area (APL) of PT Paramitra Internusa Pratama. The permit describes that area of PT Paramitra Internusa Pratama \pm 20,000 Ha clearly located in Non-Forest Designated Area (Kawasan Budidaya Non Kehutanan/Area Penggunaan Lain) refer to Ministry of Forestry decree SK Menhutbun Nomor: 259/Kpts-II/2000, Forest Designated Area of Kalimantan Barat. • Plantation Permit: "Keputusan Bupati Kapuas Hulu Nomor 239 Tahun 2012", dated 12 July 2012 regarding "Izin Usaha Perkebunan" of PT Paramitra Internusa Pratama for area 20,000 Ha and Mill capacity 80 MT/hour. • Land Title (HGU): "Keputusan Menteri Agraria dan Tata Ruang/BPN Nomor: 35/HGU/KEM-ATR/BPN/2015", dated 7 May 2015 regarding Land Title of PT Paramitra Internusa Pratama. There are eight (8) | |
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| | | <p>parcels of land title with total area is 13,173.93 Ha. Land title certificate as below:</p> <ol style="list-style-type: none"> 1. Land certificate No. 00039, issued 26 June 2015, validity 7 May 2050. Hectarage: 362.26 Ha (Tengkawang Estate) 2. Land certificate No. 00040, issued 26 June 2015, validity 7 May 2050. Hectarage: 222.46 Ha (Tengkawang Estate) 3. Land certificate No. 00041, issued 26 June 2015, validity 7 May 2050. Hectarage: 3,192.09 Ha (Tengkawang Estate and Belian Estate) 4. Land certificate No. 00042, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,289.74 Ha (Tengkawang Estate and Belian Estate) 5. Land certificate No. 00043, issued 26 June 2015, validity 7 May 2050. Hectarage: 2.54 Ha (Tengkawang Estate) 6. Land certificate No. 00044, issued 26 June 2015, validity 7 May 2050. Hectarage: 1.50 Ha (Tengkawang Estate) 7. Land certificate No. 00045, issued 26 June 2015, validity 7 May 2050. Hectarage: 4,995.26 Ha (Tengkawang Estate and Belian Estate) 8. Land certificate No. 00046, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,108.08 Ha (Tengkawang Estate) <ul style="list-style-type: none"> • Building Rights (HGB) for Belian POM, covering area 15.14 Ha refer to legal documents as below: <ol style="list-style-type: none"> 1. Certificate HGB No. 00002, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 24,406 m² (2.44 Ha), land use for POME pond. 2. Certificate HGB No. 00003, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 66,189 m² (6.62 Ha), land use for Mill. | |
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| 2.1.2 | <p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p> <p>- Minor compliance -</p> | <p>In order to comply with legality, the company shows "<i>Formulir Evaluasi Kepatuhan Terhadap Peraturan dan Persyaratan Lainnya</i>". Evaluation of legal compliance conducted by SPO team per aspect as follow:</p> <ul style="list-style-type: none"> • High Conservation Value aspect updated in September 2024. • OHS aspect updated in August 2024. • Labour aspect updated in September 2024. • Environment aspect updated in September 2024. • License aspect updated on 30 April 2024. • Social aspect updated on 31 January 2024. <p>The update of the document was carried out referring to the "SOP for Compliance with Regulations and Other Requirements" (SOP/SMART/UMUM/SADV/I/002) dated 1 July 2014. Objective of the is to identify, determine, obtain and evaluate the fulfilment/compliance with the legal documents/regulations/requirements related to the principles and criteria of sustainable palm oil production; and maintain and update the legal documents/regulations/requirements related to the principles and criteria of sustainable palm oil production. Procedure explains that evaluation carried out at least once a year.</p> <p>In the list, the company has also included the latest regulations, for example:</p> <ul style="list-style-type: none"> • <i>Undang-undang RI No.32 Tahun 2024 tentang Perubahan atas UU No.5 Tahun 1990 tentang Konservasi Sumber Daya Alam Hayati dan Ekosistemnya</i>, dated 7 August 2024. • <i>Peraturan Menteri Ketenagakerjaan RI No.11 Tahun 2023 tentang Keselamatan dan Kesehatan Kerja di Ruang Terbatas</i>, dated 21 November 2023. | Complied |
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| | | <ul style="list-style-type: none"> • <i>Undang-undang No.6 Tahun 2023 tentang Penetapan Peraturan Pemerintah Pengganti Undang-undang No.2 Tahun 2022 tentang Cipta Kerja menjadi Undang-undang</i>, dated 31 March 2023. • <i>Peraturan Presiden No.57 Tahun 2023 tentang Wajib Laporan Lowongan Pekerjaan</i>, dated 25 September 2023. • <i>Undang-undang RI No.4 Tahun 2024 tentang Kesejahteraan Ibu dan Anak pada 1000 hari Pertama Kehidupan</i>, dated 2 July 2024. <p>Additionally, the company ensures that its contractors and third parties are aware of and comply with the Sinarmas Agribusiness and Food Business and Human Rights Policy, as documented in Form No. F/SMART/GENERAL/SADV/006/001 (<i>Form Evaluasi dan Rekomendasi Kontraktor</i>). This form is used to evaluate contractors, assessing their adherence to various company requirements, including legal compliance, company procedures, and environmental standards.</p> <p>Observation on previous OFI: Unit of certification has provided information to show the system top ensuring legal compliance has been reviewed regularly. This evaluation running by SPO officer in each unit mill/estate.</p> | |
| 2.1.3 | <p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p> | <p>Unit of certification having 177 boundary poles which 83 poles located in Belian Estate and 94 poles located in Tengawang Estate. Based on the latest boundary poles monitoring report per June 2024, it reported that 83 poles in Belian Estate and 64 boundary poles in Tengawang Estate well-maintained. 30 poles in Tengawang Estate cannot planted due to located in enclave areas.</p> <p>Based on field visit to boundary areas, the auditor team visited boundary poles No. PIP 099 Block P70 Division 1, PIP 109 Block Q69 Division 1,</p> | Complied |

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| | | PIP 499 Block O59 Division 1 Belian Estate, PIP 476 Block J26 Division 6, PIP 378 Block H14 Division 6 and PIP 530 Block H14 Division 6 Tengawang Estate. All boundary poles clearly visible and maintained. | |
| Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. | | | |
| 2.2.1 | A list of contracted parties is available. - Minor compliance - | Unit of certification able to show the list of contractors, including FFB suppliers and transporter. The list of local contractors is documented in "Rekap Kontrak Lokal Belian Estate June 2024", dated 25 June 2024. Where total contractor comprises of 48 local contractors. Type of contractors Empty Bunch vehicle rent, painting, drainage, road maintenance, water transportation, etc. | Complied |
| 2.2.2 | All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party. - Minor compliance - | The certification unit has not been able to show complete documentation of contracts with third parties. For example, sales contracts/cooperation for processing FFB with suppliers, transportation of FFB with local contractors, and transportation contracts for CPO/PK. This is raised as noncompliance . | Non-compliance |
| 2.2.3 | All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. - Minor compliance - | In operational work, PT PIP in collaboration with some contractors both in Mill as well as on the Estate. Here's a list contractor for a period of 2023-2024: <u>Tengkawang Estate:</u> CV Lintas Batas Sejahtera: <u>Belian Estate:</u> There are 10 contractors, namely: 1. On behalf of Triyadi: EFB Transportation 2. Eko Surayanto: potong rumput 3. Tadeus Kasu; pengerasan jalan dengan laterit 4. CV Lintas Batas Sejahtera | Complied |

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| | | <ol style="list-style-type: none"> 5. Sohibin: pengecatan club house 6. Sulastin: seddot dan kuras septiktank 7. Sugeng Ariyanto: FFB Trasporter 8. Bebedictus Achoi: Sewa Speed boat 9. Antok D.H: Pruning Khusus 10. Helena Pulestari: Boangkar muat Pupuk dari gudang longhouse ke gudang central <p>Belian Mill has FFB suppliers from the core (Belian Estate, Tengkwang Estate and Plasma), so there are no FFB suppliers from outside.</p> <p>Plasma Cooperative Cooperative Plantation Partners Coconut Kuyang Sawit Gana. Based on the partnership cooperation in agreement with <i>Perjanjian Kerjasama Pembangunan dan Pengelolaan Kebun Kemitraan</i> No. 01/PK/KOPSA-MPG/PT.PIP/042010 dated 10 April 2010 between PT Paramitra Internusa Pratama and Koperasi Perkebunan Kelapa Sawit Mitra Puyang Gana.</p> <p>Verification is carried out on the cooperation agreement documents:</p> <ol style="list-style-type: none"> 1. Surat Perjanjian Kerja No. 038/BLNE/SPKL/08/2024 August 19, 2024 between PT Paramitra Internusa Pratama and Triyadi for for the paving work of the main road of CPO until October 20, 2024. 2. Surat Perjanjian Kerja No. 018/BLNE/SPKL/03/2024 March 15, 2024 between PT Paramitra Internusa Pratama and Tadeus Kasu for the paving work of the main road of CPO, until June 14, 2024. 3. Surat Perjanjian Kerja No. 010/BLNE/DIV2/SPKL/01/2024 January 1, 2024 between PT Paramitra Internusa Pratama and Sugeng Ariyanto for the FFB transporting to the Belian Mill until June 30, 2024. | |
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| | | <p>4. Surat Perjanjian Kerja No. 061/TNKE/SPKL/04/2024 May 1, 2024 between PT Paramitra Internusa Pratama with Edy Kasim on behalf of CV Lintas Batas Sejahtera for excavator usage services (road repair and construction, paving with laterite) in Tengkwang Estate. Valid until July 31, 2024.</p> <p>5. Surat Perjanjian Kerja No. 03/BLNE/SPKL/Div03/2024 January 2, 2024 between PT Paramitra Internusa Pratama and Triyadi for empty bunch (EFB) transportasi, until December 31, 2024</p> <p>Based on the verification of the documents that have been signed together, that specifically (Article 7; Code of Ethics), explains related to the prevention of sexual violence, no human trafficking practices, respecting human rights, forced labor and not employing children under 18 years old.</p> <p>Based on interviews with sample of employees and contractors, they have understood the code of ethics that has been agreed upon in the cooperation agreement document.</p> | |
| Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources. | | | |
| 2.3.1 | <p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p> | <p>Belian Mill using Mass Balance Module due to mill received FFB from certified and uncertified areas. The list of FFB supplier as follows:</p> <ul style="list-style-type: none"> Belian Estate/BLNE – PT Paramitra Internusa Pratama (RSPO certified) Tengkawang Estate/TNKE – PT Paramitra Internusa Pratama (RSPO Certified) Belian Estate/BLNE – PT Paramitra Internusa Pratama (RSPO Noncertified) Tengkawang Estate/TNKE– PT Paramitra Internusa Pratama (RSPO Noncertified) | Complied |

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| | | <ul style="list-style-type: none"> • Belian Plasma/BLNA – PT Paramitra Internusa Pratama (RSPO Noncertified) • Kapuas Hulu Estate/KHLE – PT Persada Graha Mandiri (RSPO Noncertified) → 0° 24' 24.982" N 111° 44' 42.536" E • Sungai Beran Estate/SBRE - PT Persada Graha Mandiri (RSPO Noncertified) → 0° 27' 3.302" N 111° 44' 24.186" E • Kapuas Hulu Plasma/KHLA - PT Persada Graha Mandiri (RSPO Noncertified) • Muara Tawang Estate/MTNE – PT Kartika Prima Cipta (RSPO Noncertified) → 0° 34' 30.976" N 112° 2' 48.724" E • Muara Tawang Plasma/MTNA - – PT Kartika Prima Cipta (RSPO Noncertified) <p>Record of supplier's ownership: PT Persada Graha Mandiri Land title:</p> <ol style="list-style-type: none"> 1. Land title No. 00031 dated 26 June 2015. Total area 2,859.39 Ha. 2. Land title No. 00032 dated 26 June 2015. Total area 4,468.79 Ha. 3. Land title No. 00033 dated 26 June 2015. Total area 1,471.61 Ha. 4. Land title No. 00034 dated 26 June 2015. Total area 1,139.40 Ha. 5. Land title No. 00035 dated 26 June 2015. Total area 105.07 Ha. 6. Land title No. 00036 dated 26 June 2015. Total area 1,277.50 Ha. 7. Land title No. 00037 dated 26 June 2015. Total area 1,129.72 Ha. 8. Land title No. 00038 dated 26 June 2015. Total area 392.76 Ha. <p>Total area 12,844.24 Ha.</p> | |
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| | | <p>Plantation permit based on Head of Regency District No. 241/2012 dated 12 July 2012 for area 19,750 Ha located in Subdistrict of Silat Hilir, Kapuas Hulu Regency, Kalimantan Barat Province.</p> <p>PT Kartika Prima Cipta: Land title: 1. Land title No. 00078 dated 02 March 2018. Total area 58.6689 Ha. 2. Land title No. 00079 dated 02 March 2018. Total area 1,616.8848 Ha. 3. Land title No. 00080 dated 02 March 2018. Total area 2,722.1207 Ha. Total area 4,397.6744 Ha.</p> <p>Plantation permit based on Head of Regency District No. 245/2012 dated 12 July 2012 for area 19,200 Ha located in Subdistrict of Semitau, Kapuas Hulu Regency, Kalimantan Barat Province.</p> <p>All supplier is plantation company under Golden Agri Resources Ltd.</p> | |
| 2.3.2 | <p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p> <p>- Minor compliance -</p> | <p>According to the explanation in indicator 2.3.1 above, Belian Mill does not receive FFB from indirect source. All FFB comes from the direct unit under Golden Agri Resources Ltd.</p> | Complied |
| <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> | | | |

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| 3.1.1 | <p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p> | <p>The company has business management plan named Economic Feasibility Analysis 2022 – 2026. The plan comprises variable for Estate and Plasma in area statement, planting material, harvesting and productivity projection, mill’s extraction rate, production costs, price estimates, and other financial indicators.</p> <p>Below is the projection of productivity based on business management plan 2022 – 2026:</p> <table><tr><th>Description</th><th>2024</th><th>2025</th><th>2026</th><th>2027</th><th>2028</th></tr><tr><td>Mature area (Ha)</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>• Belian</td><td>1,947.68</td><td>1,947.68</td><td>1,947.68</td><td>1,947.68</td><td>1,947.68</td></tr><tr><td>• Tengkawang</td><td>3,303.28</td><td>3,303.28</td><td>3,303.28</td><td>3,303.28</td><td>3,303.28</td></tr><tr><td>FFB Average Yield (ton/Ha)</td><td>22.40</td><td>28.33</td><td>28.58</td><td>28.58</td><td>29.05</td></tr><tr><td>OER (%)</td><td>25.25</td><td>25.25</td><td>25.25</td><td>25.25</td><td>25.25</td></tr><tr><td>KER (%)</td><td>6.00</td><td>6.00</td><td>6.00</td><td>6.00</td><td>6.00</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>CPO Production Total</td><td>101,171</td><td>120,485</td><td>122,311</td><td>123,476</td><td>123,814</td></tr><tr><td>PK Production Total</td><td>24,041</td><td>28,630</td><td>29,064</td><td>29,341</td><td>29,421</td></tr><tr><td>CPO Production Own</td><td>38,846</td><td>50,286</td><td>51,057</td><td>51,876</td><td>51,824</td></tr><tr><td>PK Production Own</td><td>9,231</td><td>11,949</td><td>12,132</td><td>12,327</td><td>12,351</td></tr></table> <p>The company demonstrated independent financial audit report for from Registered Public Accountants Tanubrata Sutanto Fahmi Bambang & Partner (License No.622/KM.1/2016) as evidence in Independent Auditor’s Report No. 00350/2.1068/AU.1/10/1245-8/1/V/2024 dated 26 April 2024 by Benny Dwinanto, SE, CPA (Public Accountant License No. AP.1245). Based on the report, the financial statements presents fairly,</p> | Description | 2024 | 2025 | 2026 | 2027 | 2028 | Mature area (Ha) | | | | | | • Belian | 1,947.68 | 1,947.68 | 1,947.68 | 1,947.68 | 1,947.68 | • Tengkawang | 3,303.28 | 3,303.28 | 3,303.28 | 3,303.28 | 3,303.28 | FFB Average Yield (ton/Ha) | 22.40 | 28.33 | 28.58 | 28.58 | 29.05 | OER (%) | 25.25 | 25.25 | 25.25 | 25.25 | 25.25 | KER (%) | 6.00 | 6.00 | 6.00 | 6.00 | 6.00 | | | | | | | CPO Production Total | 101,171 | 120,485 | 122,311 | 123,476 | 123,814 | PK Production Total | 24,041 | 28,630 | 29,064 | 29,341 | 29,421 | CPO Production Own | 38,846 | 50,286 | 51,057 | 51,876 | 51,824 | PK Production Own | 9,231 | 11,949 | 12,132 | 12,327 | 12,351 | Complied |
|----------------------------|---|---|-------------|----------|----------|------|------|------|------------------|--|--|--|--|--|----------|----------|----------|----------|----------|----------|--------------|----------|----------|----------|----------|----------|----------------------------|-------|-------|-------|-------|-------|---------|-------|-------|-------|-------|-------|---------|------|------|------|------|------|--|--|--|--|--|--|----------------------|---------|---------|---------|---------|---------|---------------------|--------|--------|--------|--------|--------|--------------------|--------|--------|--------|--------|--------|-------------------|-------|--------|--------|--------|--------|----------|
| Description | 2024 | 2025 | 2026 | 2027 | 2028 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mature area (Ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| • Belian | 1,947.68 | 1,947.68 | 1,947.68 | 1,947.68 | 1,947.68 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| • Tengkawang | 3,303.28 | 3,303.28 | 3,303.28 | 3,303.28 | 3,303.28 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FFB Average Yield (ton/Ha) | 22.40 | 28.33 | 28.58 | 28.58 | 29.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OER (%) | 25.25 | 25.25 | 25.25 | 25.25 | 25.25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KER (%) | 6.00 | 6.00 | 6.00 | 6.00 | 6.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| CPO Production Total | 101,171 | 120,485 | 122,311 | 123,476 | 123,814 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PK Production Total | 24,041 | 28,630 | 29,064 | 29,341 | 29,421 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CPO Production Own | 38,846 | 50,286 | 51,057 | 51,876 | 51,824 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PK Production Own | 9,231 | 11,949 | 12,132 | 12,327 | 12,351 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>in all material respects, the consolidated financial position of the Group as of 31 December 2023 and its consolidated financial performance and its consolidated cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.</p> <p>Available evidence of tax receipt dated 16/11/2023; Billing ID 0281 2273 8700 117; Tax ID 02.275.842.9-706.001 of PT Paramitra Internusa Pratama; Based on "Surat Pemberitahuan Pajak Terutang" No.00005/670/23/706/23 dated 8 May 2023; tax object number 61.06.120.706.110-0052.1; PBB Perkebunan (411313 - land tax) for land 131,739,300 m² and building 30,881.22 m²; amount IDR ***,***,610,360. Additionally, available tax payment of PPH 21 dated 12 February 2024, with Billing code 028544949361031.</p> | |
| 3.1.2 | <p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p> | <p>Based on the 2024 Area Statement, it was noted that the planting years range from 2008 to 2014, making the oldest palms 14 years old. Therefore, replanting will not take place within the next five years. In line with the company's procedures, replanting will be conducted when the oil palms reach 25-30 years of age and/or when yield considerations necessitate it.</p> | Complied |
| 3.1.3 | <p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p> | <p>The unit of certification's management review is conducted through various methods, including monthly management reports, annual management reviews, internal audits, external RSPO audits, and internal or external financial audits by a public accountant.</p> <p>For example, the latest annual management review conducted on 17 September 2024, reviewing performance of PT Paramitra Internusa Pratama, PT Persada Graha Mandiri, and PT Kartika Prima Cipta. One of the agenda is reviewing RSPO internal audit report that conducted on 9-13 September 2024. Other agenda discussed during the management review including Customer feedback, Process performance and product appropriateness, Preventive and improvement action status, follow up action resulted from the management review, Changes that could</p> | Complied |

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| | | <p>influence management system, and Improvement recommendation. Sample of improvement that implemented by the unit of certification, such as:</p> <ul style="list-style-type: none"> • Automatic Drain Sand Trap: The installation of an automatic drain sand trap is designed to remove sand and other impurities from the system, which helps in reducing the formation of Free Fatty Acids (FFA) in the oil extraction process. By minimizing the presence of sand, the trap ensures a cleaner extraction environment, improving oil quality and reducing the risk of increased FFA levels, which can negatively impact oil quality and market value. • Automatic Greasing at Decanter: The implementation of an automatic greasing system at the decanter is for reducing the risk of mechanical failures, such as the decanter becoming stuck. Regular and consistent lubrication helps maintain the smooth operation of moving parts, minimizes wear and tear, and extends the equipment's lifespan. This automation reduces the need for manual intervention and lowers the risk of unplanned downtime due to equipment malfunction. | |
| Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations. | | | |
| 3.2.1 | <p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p> | <p>The company regularly conducted monitoring of continuous improvements, documented in Innovation Implementation Monitoring on 2024 period, among others:</p> <p><u>Belian Mill:</u></p> <ul style="list-style-type: none"> ○ Auto drain sand trap tank: controls the increase in FFA and reduces the rate of increase in FFA from 1.5%-2% to 0.5-1% ○ Auto grease on the tricanter machine: ensures the greasing process is always under control with automatic every hour. ○ GSIS (GAR Sustainability Information System) Module: | Complied |

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| | | <p><u>Belian Estate:</u></p> <ul style="list-style-type: none"> ○ Towards a clean hut ○ Arrange the market fronds ○ GSIS Module ○ EFACT: digitalization of oil palm plantation activity reports <p><u>Tengkawang Estate:</u></p> <ul style="list-style-type: none"> ○ Efact- harvest ○ Efact maintenance ○ Fire module on the GSIS platform ○ Social module on the GSIS platform ○ Biodiversity module on the GSIS platform ○ Fruit stamps using food coloring and stamped onto the TBS <p>Several of improvement are related to the environment and social/labor, this improvement will be implemented soon after the validity was performed.</p> | |
| 3.2.2 | <p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p> | <p>Annual Communication of Progress (ACOP) 2023 also submitted to the RSPO Secretariat under organization name Golden Agri-Resources Ltd, membership No. 1-0096-11-000-00 with links https://rspo.org/members/1-0096-11-000-00/</p> <p>Based on document verification, for The RSPO metric template known annual data 12-month periods use (January to December 2023) for schedule reporting annual data peat area, pesticide usage, average LTIFR (Lost Time Injury Frequency Rate) and freshwater usage.</p> <p>Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The data presented can be ascertained in</p> | Complied |

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| | | accordance with the existing raw data. Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. | |
| Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored. | | | |
| 3.3.1 | <p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p> | <p>The unit of certification has established detailed operational procedures for both the estate and the mill, as outlined in Estate Operational Procedure and Mill Operational Procedure.</p> <p>Estate Operational Procedure</p> <p>The Estate Operational Procedures govern all activities related to the management and maintenance of the oil palm plantations. This includes planting, fertilization, pest and disease control, harvesting, and replanting schedules. They also cover best agricultural practices to ensure sustainable cultivation, efficient resource use, and compliance with environmental and social standards. Additionally, the estate procedures address worker safety, training, and adherence to company policies on labour rights and welfare.</p> <p>There is no change in all Procedure of Agronomy that was arranged by Management Committee Agronomy and Research (MCAR) revised on 15 July 2020. Procedures were included new area and replanting planning, nursery, land clearing, preparation before planting, fertilising, upkeep, integrated pest management (IPM), road maintenance, peat land management, drainage system, mature and immature upkeep, integrated pest management and harvesting. Other than that, there were also procedures for several processes including riparian zone management, application of agrochemical. Procedure also described required PPE and other safe working practices.</p> <p>Samples of Standard Operational Procedure for agronomy are as follows:</p> | Complied |

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| | | <ul style="list-style-type: none"> • Procedure No. SOP/SMART/MCAR/I/TA-PPL about preparation of new planting. • Procedure No. SOP/SMART/MCAR/II/TA-PPJ about replanting. • Procedure No. SOP/SMART/MCAR/III/TA-BBT about nursery. • Procedure No. SOP/SMART/MCAR/IV/TA-PLB about land preparation. • Procedure No. SOP/SMART/MCAR/V/TA-TNM about planting oil palm. • Procedure No. SOP/SMART/MCAR/VI/TA-RPL replanting oil palm. • Procedure No. SOP/SMART/MCAR/VII/TA-HPT about integrated pest management. • Procedure No. SOP/SMART/MCAR/VIII/TA-PGM about weeding management. • Procedure No. SOP/SMART/MCAR/IX/TA-PPK about manuring. • Procedure No. SOP/SMART/MCAR/X/TA-PTB about field upkeep on immature area. • Procedure No. SOP No. SOP/SMART/MCAR/XI/TA-PMP about harvesting preparation. • Procedure No. SOP No. SOP/SMART/MCAR/XIII/TA-PNN about harvesting. • Procedure No. SOP/SMART/MCAR/XIV/TA-PPT about FFB transportation and delivery. • Procedure No. SOP/SMART/MCAR/XV/TA-PCH about rainfall measurement. • Procedure No. SOP/SMART/MCAR/XVI/TA-PKT about contractor control. • Procedure No. SOP/SMART/MCAR/XVII/TA-PPH about HGU pegs maintenance. | |
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| | | <ul style="list-style-type: none"> • Procedure No. SOP/SMART/MCAR/XVIII/TA-PPG about peat management and monitoring. <p>Hardcopy of procedure are available and controlled. SOPs were available at the point of use (in all section and division of estate). Copy of the procedure was available on site and is it documented in <i>Bahasa Indonesia</i>. SOP distribution to all section and division were well documented in the Form F/SMART/UMUM/SADV/001/002 (document distribution register).</p> <p>Procedure have been disseminated to all related employee (harvesting, loose fruit pickers and upkeep employee). Every morning, there is morning musters performed, basically to disseminate working procedure and instruction, and to monitor employee attendance as well.</p> <p>Mill Operational Procedure:</p> <p>The Mill Operational Procedures outline the systematic processes for receiving and processing Fresh Fruit Bunches (FFB) to be crude palm oil (CPO) and palm kernel (PK). The procedure cover quality control measures at various stages of production, including machinery maintenance, waste management, and compliance with industry standards to ensure optimal production output and minimal environmental impact.</p> <p>Procedure regarding best manufacturing practice operation in POM is available in document of "SOP Management Committee for Mill Development (MCMD). As documented in SOP/SMART/MCMD/I/TM-PKS/Rev.08, Standard Operational Procedure of Palm Oil Process, revision 8 issued by Head Office Jakarta dated 11 May 2023. The procedure describes operation instruction from FFB receiving through production, processing (grading, sterilization, threshing, pressing, clarification, nut and kernel processing) and dispatch of CPO and PK.</p> | |
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| | | <p>The Organization has also developed work instruction for each process and equipment to described specifically stages of process and equipment utilization (e.g. Preparation; Weighbridge and Loading Ramp; Sterilizer Station; Threshing and Empty Bunch Treatment Station; Pressing Station; Clarification Station; Nut and Kernel Station; Boiler and Power; Water Treatment Plant; Final Effluent; Laboratory).</p> <p>SOP for RSPO Supply Chain has been established in "SOP Supply Chain Certification Standard Mass Balance" (PT.PIP-BLNM/SOP/RANTAI PASOK-MB/02, dated 10 January 2022). The procedures cover job and responsibility, workflow, receiving of raw material, verification of delivery note, weighing, checking of raw material quality, processing, monitoring of process, validation of quality and quantity report, mass balance calculation, product delivery, registration of transaction and document control.</p> | |
| 3.3.2 | <p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p> | <p>Certificate holder has regular internal audit refer to procedure SOP/SMART/UMUM/SADV/I/009. Internal audit conducted once a year. Internal audit conducted to determine whether the CH conforms to the requirements in the RSPO P&C Indonesia National Interpretation 2020. Sighted the report of RSPO Internal Audit of PT Paramitra Internusa Pratama issued by Sustainability Compliance – OSDV. Internal audit conducted on 9 – 13 September 2024.</p> <p>The company has also audit system to check operational performance which is Operation Internal Audit (OIA), Regional Controller (RC) visit and Production Controller (PC) visit.</p> | Complied |
| 3.3.3 | <p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p> | <p>Unit of certification has regular internal audit schedule. The recent internal audit was conducted on 9 – 13 September 2024. There was one nonconformity related to supply chain during the audit. Moreover, has been observed the documentation of Regional Controller (RC) visit and Production Controller (PC) visit.</p> | Complied |

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| | | Operation Internal Audit (OIA) conducted on 3 – 10 May 2024, based on CEO letter No.103/OIA/ST/AM/04/24 dated 1 April 2024. There are two main issues raised during OIA, action plan have been determined and implemented by the management. | |
| Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations. | | | |
| 3.4.1 | <p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p> | <p>Environmental Impact Assessment</p> <p>PT Paramitra Internusa Pratama as unit of certification established Environment Impact Assessment document known as AMDAL, consist of:</p> <ol style="list-style-type: none"> 1. <i>Analisis Dampak Lingkungan (AMDAL) Rencana Pembangunan Perkebunan Kelapa Sawit</i> PT Paramitra Internusa Pratama, conducted independently by third party CV Intergraha Citra Persada, approved based on Kapuas Hulu Regent No.289/2006 dated 22 Dec 2006. 2. <i>Rencana Pengelolaan Lingkungan Hidup (RKL) Rencana Pembangunan Perkebunan Kelapa Sawit</i> PT Paramitra Internusa Pratama, approved based on Kapuas Hulu Regent No.289/2006 dated 22 Dec 2006. <ul style="list-style-type: none"> - Air quality degradation - Water quality degradation - Increased erosion - Disruption of public health 3. <i>Rencana Pemantauan Lingkungan Hidup (RPL) Rencana Pembangunan Perkebunan Kelapa Sawit</i> PT Paramitra Internusa Pratama, approved based on Kapuas Hulu Regent No.289/2006 dated 22 Dec 2006. <ul style="list-style-type: none"> - Air quality degradation | Complied |

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| | | <ul style="list-style-type: none"> - Water quality degradation - Increased erosion - Disruption of public health <p>4. <i>Upaya Pengelolaan Lingkungan Hidup (UKL) dan Upaya Pemantauan Lingkungan Hidup (UPL) Pembangunan Pabrik Pengolahan Kelapa Sawit</i> – Environment management and monitoring plan for establishment of Palm Oil Mill at Silat Hilir and Semitau District, Kapuas Hulu Regency, October 2011 with Mill capacity is 80 MT FFB/hour.</p> <ul style="list-style-type: none"> - Community unrest from dust on FFB transportation routes - Increased noise on the FFB transportation route - Dust generation on FFB transportation route - Employment opportunities - Decrease in water quality and quantity - Increased noise - Decrease in air quality - LB3 pollution generation - Community unrest from PKS waste generation - Work accidents - Decreased diversity of flora, fauna and aquatic biota - Disruption of public health <p>5. PT Paramitra Internusa Pratama operates biogas plant, environment management and monitoring (RKL-RPL) or "Addendum AMDAL Tipe A" is under process, evident by communication letter between unit of certification and consultant, PT Alam Indo Lestari, starts on 1 Jul 2022 up until 25 Nov 2022. There are also letter from Environment Agency of Kapuas Hulu Regency No.660/47/DPPLH/TL dated 13 Jun</p> | |
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| | | <p>2022 regarding direction to the revision of environment management and monitoring.</p> <p>The final process of the Addendum AMDAL Type A is in the stage of assessing the Addendum AMDAL Type A and RKL-RPL documents as outlined in the Minutes of the Meeting of the assessment of the Addendum AMDAL Type A Documents for Plantation and Palm Oil Processing Plant Activities by PT Paramitra Internusa Pratama in Silat Hilir and Semitau Districts of Kapuas Hulu Regency with number: 600.4/26/Set-AMDAL/DPPLH/TL/VII/2024 on 29 July 2024.</p> <p>Scope of AMDAL is covering environmental and social aspects assessment for all plantation and mill operations. Hectarage of AMDAL scope is referred to location permit (<i>"Surat Pengarahan Lahan dari Bupati Kapuas Hulu"</i>) No.525/993/BANG-I-A dated 4 Aug 2006 with total area is 20,000 Ha.</p> <p>Participatory with affected parties was conducted during EIA assessment through Economic and Social Questionnaire, Focus Group Discussion with adjacent communities of certification unit.</p> <p>Social Impact Assessment</p> <p>The Company has conducted a social impact assessment of its oil palm plantations and mills with a scope of (2 plantation units: Belian Estate and Tengkawang Estate and 1 mill: Belian Mill) with study area coverage of Sekadau Village, Nanga Seberuang Village, Tua Abang Village, Lemedak Village and Sentabai Village in 2015 by Corporate Social Responsibility Department - Sustainability Division.</p> <p>The positive and negative impacts have been summarized in the conclusion of the assessment results, namely:</p> | |
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| | | <p>Positive impacts involve labor, economy, transportation infrastructure, religion and social aspects:</p> <ul style="list-style-type: none"> - Help reduce unemployment in the surrounding area. - Improve employee welfare with salaries above the minimum wage. - Development of the community's economic potential with cooperation with local contractors. - Smoother community activities and mobilization. - Improved public services. - Assistance in the construction of places of worship and cooperation in religious activities. - Educating the community by attending school to a higher level. - Assistance such as the construction of boreholes, purchase of village clinic equipment, sports facilities and renovation of public buildings and facilities. <p>Negative impact:</p> <ul style="list-style-type: none"> - Untimely response from the company regarding community grievances - The company is considered not prioritizing local people to work in the company - The company is often wrong in paying employee salaries - The company is considered to be less in touch with the community and more often with village officials only. <p>The Social Impact Assessment has involved the surrounding community with correspondence and FGDs including: Public consultation with DLH, Muspika Semitau, Muspika Suhaid, and Muspika Silat hilir, Sekadau Village, Tua Abang Village, Nanga</p> | |
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| | | Seberauang Village, Sentabai Village and Lenmedak Village on 9 December 2014. | |
| 3.4.2 | <p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p> | <p>Environmental Impact Assessment</p> <p>Environmental Management and Monitoring Plan (RKL-RPL) is part of EIA or AMDAL document (see indicator 3.4.1) where the participatory of affected parties was conducted during the assessment.</p> <p>Available report of Management and Monitoring Plan (RKL-RPL) PT Paramitra Internusa Pratama, 2nd Semester 2023 and 1st Semester 2024. Last report has been submitted to Ministry of Environment and Forestry on 30 Jul 2022, Kapuas Hulu Regency Office of Environmental, Plantation and Manpower on 10 Oct 2022. The report summarized that:</p> <ul style="list-style-type: none"> - Ambient air quality is complied to PP No.41/1999. - Air emissions are according to KepMenLH No.13/2009. - Forest fire trend is decrease during management period due to no land clearing conducted by local communities, and routine patrol performed by the company in concession area. - Erosion level is in light level, need to be maintained to achieve lower level of erosion. - River water quality analysis shows that main parameters (BOD and COD) are still under the threshold according to PP No.82/2001. <p>Social Impact Assessment</p> <p>The company has shown evidence review of the management plan and monitoring of social impacts of plantations and palm oil mills for the period 2022-2023 conducted jointly with affected village communities such as with representatives of Penai Village on 3 March 2023, as well as Belian Estate and Tengawang Estate on 27February 2023, with Belian Mill on 1 March 2023, Sekedau Village on 28 February 2023, Tua</p> | Complied |

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| | | <p>Abang Village on 27 February 2023 and Nanga Seberuang Village on 25 February 2023.</p> <p>In addition, the company has also shown evidence of interviews with communities and employees in the context of making management plans and social impact monitoring plans for 2024, namely:</p> <ol style="list-style-type: none"> 1. With the community of Tua Abang Village on 12 January 2024. 2. With the community of Nanga Seberuang Village and Lemedak Village on 12 January 2024. 3. With the community of Sekedau Village on 12 January 2024. 4. With the community of Belian Mil held on 11 January 2024 5. With the community of Belian Estate on 11 January 2024 6. With the community of Sentabai Village carried out on 15 January 2024. <p>The interviews resulted in a plan of social management and monitoring activities for 2023-2024, namely:</p> <ol style="list-style-type: none"> 1. Negative Impact: <ul style="list-style-type: none"> - The existence of road dust that has the potential to disturb the community. 2. Positive Impact: <ul style="list-style-type: none"> - Routine provision of social assistance by the company to the surrounding community - Community involvement in environmental management activities. - Lending an ambulance when there is a community in need. - Development support for one-roof junior high school. - Replacement of damaged trash cans. | |
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| | | <ul style="list-style-type: none"> - Replacement of dead housing street lights. - Affirmation of the prohibition of drinking alcohol in the housing. - Request for the construction of a water storage pond for the cage program. | |
| 3.4.3 | <p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p> | <p>Environmental Impact Assessment</p> <p>Environmental Management and Monitoring Plan (RKL-RPL) is part of EIA or AMDAL document, where the participatory of affected parties was conducted during the assessment.</p> <p>Environmental management and monitoring plan is implemented, reviewed and updated regularly. Available report of Management and Monitoring Plan (RKL-RPL) PT Paramitra Internusa Pratama, 2nd Semester 2023 and 1st Semester 2024. Last report has been submitted to Ministry of Environment and Forestry and Kapuas Hulu Regency Office of Environmental, Plantation and Manpower on 18 September 2024 by SIMPEL.</p> <p>Social Impact Assessment</p> <p>PT Paramitra Internusa Pratama has presented the social impact monitoring report of the mill and oil palm plantations (Belian Estate, Belian KKPA, Belian Mill and Tengawang Estate for the period of 2023 with the study villages being Nanga Seberuang Village, Lemedak Village, Sekedau Village, Sentabai Village and Tua Abang Village. The report has monitored all positive and negative social impacts that occurred during 2023 as well as community and employee perceptions of the company's operational activities including:</p> <ol style="list-style-type: none"> 1. Maintenance of producing oil palm plants with positive and negative impacts that have been managed so as to create a community perception that employment by PT PIP is considered to have helped the community's economy, many local people have | Complied |

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| | | <p>worked at the company, workers have received routine health check facilities.</p> <ol style="list-style-type: none">2. Transportation of production products with positive and negative impacts that have been managed so as to create community perceptions that road watering activities are still routinely carried out by the company, the community feels a positive impact with the presence of local contractors, repairing plantation access roads is carried out regularly.3. Maintenance of roads and bridges with positive and negative impacts that have been managed so as to create community perceptions that the community can use plantation access roads, the existence of PT PIP plantations has helped open community access roads.4. The process of production and loading of CPO with positive and negative impacts that have been managed so as to create a community perception that the community feels the benefits of employment, there is an increase in the economy of employees because there is additional income along with facilities and benefits.5. Waste treatment and utilization with positive and negative impacts that have been managed where the company has conducted water and air quality tests every semester and there are no indications of pollution.6. Corporate social responsibility with positive and negative impacts that have been managed so as to create a community perception that assistance has been provided by the company, there is a request to make a water storage pond and can be used for alternative income through the cage program planned by the Tua Abang Village government. | |
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| | | <p>7. Palm oil partnerships with positive and negative impacts that have been managed so as to create a community perception that the oil palm partnership between the company and the community (through cooperatives) has been running well, communication is well established between the company represented by the Partner, cooperative management and Farmers.</p> <p>In addition, the report also describes the recapitulation of CSR activities during 2023, covering the fields of education, health, economy and infrastructure.</p> <p>The conclusions of the social impact monitoring that has been carried out on the three main issues identified from the results of the previous review are:</p> <p>Routine provision of social assistance by the company to the surrounding community</p> <p>1. Perception that the company has carried out good environmental management.</p> <p>The existence of road dust that disturbs the community with the implementation of road watering which is carried out regularly in accordance with the provisions.</p> <ul style="list-style-type: none"> • Lemedak Village <ul style="list-style-type: none"> - Ambulance loan when there is a community in need - Construction support for one-roof junior high school • Tua Abang Village <ul style="list-style-type: none"> - Request for the construction of a water storage pond for the cage program • Belian Mill and Belian Estate <ul style="list-style-type: none"> - Replacement of damaged trash cans | |
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| | | <ul style="list-style-type: none"> - Replacement of dead cottage street lights - Affirmation of the prohibition of drinking liquor in the cottage environment | |
| Criteria 3.5: A system for managing human resources is in place. | | | |
| 3.5.1 | <p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p> | <p>Related to the employment's procedures, on this period (2023-2024) there was no changes, such as:</p> <ul style="list-style-type: none"> • Recruitment: according to "<i>SOP Rekrutmen dan Seleksi Karyawan</i>" (AA-HR-305.2-R0) dated 1 February 2009 regarding employee recruitment and selection, the company recruits new employee based on their capabilities and qualifications. • Promotion: according to "<i>SOP Promosi dan Mutasi</i>" (KHI-SMART/010-00) dated 1 August 2017. The procedure regulated employee promotion related position and grade. • Retirement, and termination: according to Collective Labour Agreement (KEP.4/HI.00.01/19.1905.210621001/B/X/2021) dated 29 October 2021. Article 39 described related to retirement and Article 40 related to termination. <p>On PKB (Joint Working Agreement) period of 2024-2026 is also explained related to the promotion, retirement and termination of workers. PKB ini telah di tandatangani oleh wakilperusahaan dan wakil Serikat Pekerja. This PKB have been signed by company representative and representatives of the unions</p> <p><i>Pasal 13; Penerimaan Pekerja Baru;</i></p> <p>Candidates who have met the requirements and have passed the selection held by the company, accepted as workers/labour with through the trial/probation not longest than 3 months since the candidate began to work in the company and the existence of a probation period.</p> | Complied |

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| | | <p>Pasal 14; <i>Perubahan posisi/jabatan, penempatan dan pemindahan pekerja/buruh</i></p> <p>Change position and the transfer of workers/labour, the company will always pay attention to the ability and prowess workers/labour concerned with poured in the decision.</p> <p>BAB X; <i>Pemutusan Hubungan Kerja (PHK)</i></p> <p>In the event of layoffs, referring to the Law No. 13 know 2003 about employment, UU Cipta Kerja No. 11 years 2020 about copyright work Jo. UU No. 2 in 2004 about the completion of the industrial relations dispute.</p> | |
| 3.5.2 | <p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p> | <p>Related to the employemnet's procedures, on this period (2023-2024) there was no changes, such as:</p> <ul style="list-style-type: none"> Recruitment: according to "<i>SOP Rekrutmen dan Seleksi Karyawan</i>" (AA-HR-305.2-R0) dated 1 February 2009 regarding employee recruitment and selection, the company recruits new employee based on their capabilities and qualifications. Promotion: according to "<i>SOP Promosi dan Mutasi</i>" (KHI-SMART/010-00) dated 1 August 2017. The procedure regulated employee promotion related position and grade. Retirement, and termination: according to Collective Labour Agreement (KEP.4/HI.00.01/19.1905.210621001/B/X/2021) dated 29 October 2021. Article 39 described related to retirement and Article 40 related to termination. <p>On PKB (Joint Working Agreement) period of 2024-2026 is also explained related to the promotion, retirement and termination of workers. PKB ini telah di tandatangani oleh wakilperusahaan dan wakil</p> | Complied |

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| | | <p>Serikat Pekerja. This PKB have been signed by company representative and repressentatives of the unions</p> <p>Pasal 13; <i>Penerimaan Pekerja Baru;</i></p> <p>Candidates who have met the requirements and have passed the selection held by the company, accepted as workers/labour with through the trial/probation not longest than 3 months since the candidate began to work in the company and the existence of a probation period.</p> <p>Pasal 14; <i>Perubahan posisi/jabatan, penempatan dan pemindahan pekerja/buruh</i></p> <p>Change position and the transfer of workers/labour, the company will always pay attention to the ability and prowess workers/labour concerned with poured in the decision.</p> <p>BAB X; <i>Pemutusan Hubungan Kerja (PHK)</i></p> <p>In the event of layoffs, referring to the Law No. 13 know 2003 about employment, UU Cipta Kerja No. 11 years 2020 about copyright work Jo. UU No. 2 in 2004 about the completion of the industrial relations dispute.</p> <p>Verification was carried out on several recruitment and promotion processes.</p> <p>Example of promotion:</p> <ul style="list-style-type: none"> ○ Promotion from Group/Status PKH-SW (Daily Worker – Time Unit) to PT-4A for worker Riki Candra (NIK: 2181229) position of Field Worker in Plantation as Plant Upkeep in Division I as of January 25, 2024 based on Estate Manager Decree No. 002/SK-EST/I/2024 dated January 25, 2024 with a wage of IDR 2,746,010 | |
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| | | <ul style="list-style-type: none"> ○ Promotion from Group/Status PKH-SW (Daily Worker – Time Unit) to PT-4A for worker Eleser (NIK: 2380671) position of Field Worker in Plantation as Plant Upkeep in Division I as of January 25, 2024 based on Estate Manager Decree No. 002/SK-EST/I/2024 dated January 25, 2024 Wages amounting to IDR 2,746,010 <p>Example of Recruitment proses:</p> <p>On August 24, 2024 for oil palm harvesting work at Tengkawang Estate: Employee candidate Rizki Candra Al Rosyid with address at Dusun Pecuk Rt/Rw: 29/010, Ngabar Village, Jetis District, Mojokerto Regency, East Java Province</p> <p>Application for approval of PT-3 employees Rizki Candra Al Rosyid to RC Semitau (Mr. Elvin Junaidi Silaban) dated August 24, 2024.</p> <p>List of personnel administration equipment: application letter, photocopy of KTP and family card and health check results at Kebun Belian Clinic.</p> <p>Employment Acceptance Letter No. 145/SK-PT-3/TNKE/08/2024 dated August 24, 2024 in the name of employee candidate Rizki Candra Al Rosyid for harvesting workers in Division 02 Tengkawang Estate.</p> <p>Based on interviews with sample workers and also document verification, there was no coercion, collection of fees and withholding of personal documents of prospective workers.</p> | |
| Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented. | | | |
| 3.6.1 | <p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p> | PT Paramitra Internusa Pratama has an Occupational Safety and Health Policy that refers to the SMART Tbk Occupational Safety and Health Policy on 1 November 2013 in the policy states that the company is committed to: | Complied |

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| | | <ul style="list-style-type: none"> - Communicate SMK3 policies and procedures to all employees and interested parties to ensure that they understand the obligations related to the company's activities. - Comply with all applicable laws, regulations, and other provisions related to OHS - Ensure the implementation of SMK3 as part of the company's operations - Identify, assess, and control the risk of hazards in every activity in the work environment with a continuous improvement approach to prevent accidents and occupational diseases. - Manage and monitor SMK3 indicators and make continuous improvements to improve K3 management performance. <p>PT Paramitra Internusa Pratama has prepared procedures and work instruction related to OHS management system (to comply with Government Regulation 50, year 2012 – "<i>Sistem Manajemen Keselamatan dan Kesehatan Kerja</i>", such as:</p> <ul style="list-style-type: none"> • Development and Communication Policy (SOP/SMART/HESS-EHSD/SADV/I/01). • Hazard Identification and Risk Assessment (SOP/SMART/HESS-EHSD/SADV/I/02). • OHS objectives and targets (SOP/SMART/HESS-EHSD/SADV/I/03). • OHS Programmes (SOP/SMART/HESS-EHSD/SADV/I/04). • Incident and Occupational Disease Handling (SOP/SMART/HESS-EHSD/SADV/I/05). • Material Handling (SOP/SMART/HESS-EHSD/SADV/I/06). • Design Review (SOP/SMART/HESS-EHSD/SADV/I/07). • Infrastructures Maintenance and Changes (SOP/SMART/HESS-EHSD/SADV/I/08). | |
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| | | <ul style="list-style-type: none"> • Lock Out Tag Out (SOP/SMART/HESS-EHSD/SADV/I/009). • PPE Management (SOP/SMART/HESS-EHSD/SADV/I/010). • First Aid (SOP/SMART/HESS-EHSD/SADV/I/011) . • Health Measurement (SOP/SMART/HESS-EHSD/SADV/I/012). • Fire Extinguisher (SOP/SMART/HESS-EHSD/SADV/I/013). • Hydrant Utilization (SOP/SMART/HESS-EHSD/SADV/I/014). • Safe work permit (SOP/SMART/HESS-EHSD/SADV/I/015). • OHS Measurement and Monitoring (SOP/SMART/HESS-EHSD/SADV/I/016). • OHS Management Review (SOP/SMART/HESS-EHSD/SADV/I/017). <p>Risk Assessment for all operations regarding health and safety was available within the scope of palm oil mill processes activities and plantation activities. As it was considered the stages of OHS risk control hierarchy, that is elimination, substitution, engineering, administrative and PPE (Personnel Protective Equipment).</p> <p>Verified risk assessment record:</p> <ul style="list-style-type: none"> • Belian POM – has defined risk assessment (ISBPPR) year 2024, last review on 3 Mei 2024, cover processes and activities related to production of CPO, such as: transportation, security, weighbridge, boiler, engine room, loading ramp, sterilizer, threshing, pressing, kernel operation, clarification, office, lab, CPO dispatch, firefighting simulation, water treatment, chemical warehouse, medical surveillance, Covid-19, housekeeping, etc. • Belian Estate and Tengawang Estate – has defined risk assessment (ISBPPR) last review on 16 Jan 2024, the document covers processes and activities such as: IPM, fertilizing, spraying, weeding, road maintenance, firefighting simulation harvesting, transportation, | |
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| | | <p>warehouse, workshop, infrastructure, polyclinic, etc. It also covered all the risk attached to the products.</p> <ul style="list-style-type: none"> Risk assessment of biogas plant has been documented in ISBPR year 2024, last review on 3 Mei 2024, of unit BLNF (Belian Flare). Risk assessment includes Biodigester system, Biogas system, Control room system, open fire extinguisher. <p>The risk assessment has been communicated to all employee</p> | |
| 3.6.2 | <p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p> | <p>PT Paramitra Internusa Pratama has prepared OHS plan to address health and safety as per "Program Kerja" updated on 10 January 2024, consisted of:</p> <ul style="list-style-type: none"> OHS Committee Monthly Meeting Socialization of OHS policy Socialization of work instructions Inspection of PPE needs PPE condition monitoring Monitoring of firstaid equipment PPE distribution Spray, fertilizer, harvest, workshop Improvement of OHS warnings and signs General physical health check Chemical, physical, psychological, and ergonomic NAB checks of the work environment Special health checks Emergency simulation Internal audit of SMK3 <p>The safety committee (P2K3) regular meeting has been performed monthly, discussing regarding OHS plan achievement and corrective actions to achieve target and improve the program. Notes of Safety</p> | Complied |

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| | | <p>Committee Regular Meeting (mill and estate) available in August 2024, among others discussed as follows:</p> <ul style="list-style-type: none">• Preparation for external audit,• Personal Protective Equipment (PPE),• Safety notes,• Inspection of non-compliance at each department. <p>The actions implemented were monitored and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed at the meeting such as: review of accident, PPE Checklist update, internal audit result and incident investigation.</p> <p>Emergency Response and Preparedness drill has been implemented as per document "<i>Simulasi Tanggap Darurat Gabungan 2024</i>", conducted on 1 August 2024, attended more than 50 participants.</p> <p>The company has also conducted training/socialization related to ISBPR/HIRAC, OHS for new employees, contractor OHS, KSLG and OHS plan.</p> <p>The company has shown evidence of work environment measurements contained in the certificate of analysis Industrial Hygiene Monitoring PT Paramitra Internusa Pratama Belian Estate, Tengawang Estate and Belian Mill from PT Petrolab Services which is carried out every 1 year, the last measurement was carried out on 9-10 October 2023 with measurement parameters including: Air quality in the room, metal content in the air, dust concentration in the work environment, hot working climate in the work environment, lighting, arm and hand vibration, whole body vibration, work environment noise, personal noise dose, ergonomics and psychosocial. Based on the measurement results, there are several parameters that exceed the allowable threshold values such as high noise, lack of lighting, and work ergonomics, all findings</p> | |
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| | | <p>that do not comply with the predetermined thresholds have been followed up and have been closed on 25 November 2023.</p> <p>The company has shown evidence of the results of inspection and testing of production equipment and machinery from the Manpower and Transmigration Office including:</p> <ul style="list-style-type: none">- Lightning distributor installation on August 14-16, 2023, re-inspection date in August 2025.- 22 Tractor on 14-16 August 2023, re-inspection date in August 2025.- 2 Road Compactor on 14-16 August 2023, re-inspection date in August 2025.- Excavator on August 14-16 August 2023, recheck date in August 2025.- 2 Road Graders on 14-16 August 2023, date of recheck in August 2025.- 11 Diesel Motorcycle on 14-16 August 2023, date of recheck in August 2025.- Bulldozer on 14-16 August 2023, date of recheck in August 2025. <p>The company has shown evidence of inspection and testing results of mill production equipment and machinery from the Department of Labor and Transmigration including:</p> <ul style="list-style-type: none">- CPO storage tanks 01, 02 and 03 on 14 June 2023, re-inspection date in June 2025.- 3 units of lightning distributor installation on 15 June 2023, re-inspection date in June 2025.- Diesel storage tank on 14 June 2023, recheck date on June 2025.- Air compresor on 14 June 2023, inspection date back to June 2025.- Air receiver tank on 14 June 2023, date of recheck in June 2025. <p>The Company has also conducted periodic test check for the year 2024 in August 2024 for Turbine, Genset, air compresor, steam vessel, lathe,</p> | |
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| | | <p>scrap machine, drilling machine based on the minutes of 22 August 2024.</p> <p>The company has shown evidence of hyperkes training for company doctors in February 2018 from the Ministry of Manpower based on certificate number 47.372/DBK3-DH/02/I/2018.</p> <p>The company has shown evidence of inspections for non-disciplinary use of PPE on 18 January 2024, 6 March 2024, 25 April 2024, and 30 April 2024.</p> | |
| Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained. | | | |
| 3.7.1 | <p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p> | <p><u>Tengkawang Estate</u></p> <p>Semitau Region Training Needs Identification Matrix for 2024 dated January 3, 2024: consists of: 20 types of non-certification training and 6 types of non-certification training.</p> <p>Example:</p> <ol style="list-style-type: none"> 1. First Aid Training on February 20, 2024 by Semitau Region Doctor attended by 12 workers. 2. K3 Coaching Certification Training for Heavy Equipment Operators on August 5, 2024, this training was held by PT Sepakat Jaya Pertama attended by 5 workers. 3. Training on implementation of K3 and emergency response on March 18, 2024, 4. Training on Industrial Relations policy on June 24, 2024 5. On June 16, 2024, PKB socialization training 6. On July 23, 2024, socialization related to understanding HCV areas <p><u>Belian Estate</u></p> | Complied |

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| | | <p>Semtau Region Training Needs Identification Matrix for 2024 dated January 30, 2024: consists of: 20 types of non-certification training and 6 types of non-certification training.</p> <p>Example:</p> <ol style="list-style-type: none"> 1. First Aid Training on February 20, 2024 by Semtau Region Doctors attended by 12 workers. 2. Training on August 10-13, 2024; training related to the Development of Heavy Equipment Lifting and Transport Operators organized by PT Sepakat Jaya Pertama attended by 5 workers from PT PIP. 3. Certification Training for K3 Development for Heavy Equipment Operators on August 10-13, 2024, this training was held by PT Sepakat Jaya Pertama attended by 6 workers. 4. August 5-8, SIO training for Lifting and Transport Operators on behalf of Andreas Madang 5. September 6, 2024, First Aid refresher training <p><u>Belian Mill:</u></p> <p>Semtau Region Training Needs Identification Matrix for 2024 dated January 30, 2024: consists of: 20 types of non-certification training and 6 types of non-certification training.</p> <p>For example:</p> <ol style="list-style-type: none"> 1. August 6, 2024, KSLG training/socialization 2. September 25, 2024, generator management training by PT Tranindo Pratama Mulia <p>The company also provides training access to partnership farmers (Plasma), as follows:</p> | |
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| | | <ul style="list-style-type: none"> a. On September 10, 2024, training on taxation training was attended by 12 farmers located at the Sintang plasma KPP (Tax Service Office) b. Training on July 17, 2024, training on Plasma Garden Practices and Field Visits and introduction P&C RSPO as well was attended by 16 Farmers located in Division III Plasma and the Puyang Gana Mitra Palm Oil Cooperative Office. c. On July 24, 2024, training on cooperative financial reporting was attended by 13 farmers located at the Puyang Gana Mitra Palm Oil Cooperative Office. <p>Based on verified documents and interviews with HRD the company, that training programs has been run in accordance with the program that has been set.</p> | |
| 3.7.2 | <p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p> | <p>PT PIP has made a record of the training that has been carried out on each individual recorded in the Personal Training Record. The company has recorded all training activities attended by workers and recorded them in the worker's file folder. At the time of the surveillance audit, it was verified that all documents were well maintained and easy to trace.</p> <p>Example:</p> <ul style="list-style-type: none"> o Employee name: Ernawati (Spray foreman) Division 3, Tengkawang Esatate NIK: 2100914 Type of training, last on July 16, 2024 socialization of the company's vision and mission, PKB and sexual harassment. o Employee name: Andreas Madang (Tractor Operation), Belian Esatate NIK: 17042 | Complied |

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| | | <p>Type of training: August 5-8, 2024; SIO training (External by Sepakat Jaya), September 6, 2024 First Aid Refresh.</p> <p>After verifying documents and interviews with some sample workers, that training program has been run, recordings maintained and stored well, including recordings individually workers can also be shown at the time of audit.</p> | |
| 3.7.3 | <p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p> | <p>Until this audit was completed, unit of certification had not been able to demonstrate the training evidence for personnel responsible for implementing the SCC.</p> <p>Based on interviews with FFB receiving officers (security and weighbridge operators) and the production clerk, they do not yet have adequate understanding regarding the implementation of SCC.</p> <p>This is raised as noncompliance.</p> | Non-compliance |
| <p>Criteria 3.8: Supply chain requirements for mills.</p> <p>Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p> | | | |
| 3.8.1 | <p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p> | <p>Belian Mill using Mass Balance Module due to mill received FFB from certified and uncertified areas. The list of FFB supplier as follows:</p> <ul style="list-style-type: none"> • Belian Estate/BLNE – PT Paramitra Internusa Pratama (RSPO certified) • Tengawang Estate/TNKE – PT Paramitra Internusa Pratama (RSPO Certified) • Belian Estate/BLNE – PT Paramitra Internusa Pratama (RSPO Noncertified) • Tengawang Estate/TNKE– PT Paramitra Internusa Pratama (RSPO Noncertified) | Not Applicable |

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| | | <ul style="list-style-type: none"> • Belian Plasma/BLNA – PT Paramitra Internusa Pratama (RSPO Noncertified) • Kapuas Hulu Estate/KHLE – PT Persada Graha Mandiri (RSPO Noncertified) • Sungai Beran Estate/SBRE - PT Persada Graha Mandiri (RSPO Noncertified) • Kapuas Hulu Plasma/KHLA - PT Persada Graha Mandiri (RSPO Noncertified) • Muara Tawang Estate/MTNE – PT Kartika Prima Cipta (RSPO Noncertified) • Muara Tawang Plasma/MTNA - – PT Kartika Prima Cipta (RSPO Noncertified) <p>Thus, this indicator is Not Applicable</p> | |
| 3.8.2 | <p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> | <p>Belian Mill using Mass Balance Module due to mill received FFB from certified and uncertified areas. The list of FFB supplier as follows:</p> <ul style="list-style-type: none"> • Belian Estate/BLNE – PT Paramitra Internusa Pratama (RSPO certified) • Tengawang Estate/TNKE – PT Paramitra Internusa Pratama (RSPO Certified) • Belian Estate/BLNE – PT Paramitra Internusa Pratama (RSPO Noncertified) • Tengawang Estate/TNKE– PT Paramitra Internusa Pratama (RSPO Noncertified) • Belian Plasma/BLNA – PT Paramitra Internusa Pratama (RSPO Noncertified) • Kapuas Hulu Estate/KHLE – PT Persada Graha Mandiri (RSPO Noncertified) | Complied |

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| | | <ul style="list-style-type: none"> Sungai Beran Estate/SBRE - PT Persada Graha Mandiri (RSPO Noncertified) Kapuas Hulu Plasma/KHLA - PT Persada Graha Mandiri (RSPO Noncertified) Muara Tawang Estate/MTNE – PT Kartika Prima Cipta (RSPO Noncertified) Muara Tawang Plasma/MTNA - – PT Kartika Prima Cipta (RSPO Noncertified) <p>To monitor the production balance, unit of certification implemented real time mass balance calculation.</p> | |
| 3.8.3 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. | <p>Based on the last public summary report and certificate, unit of certification awarded total certified product as follows:</p> <ul style="list-style-type: none"> FFB: 132,696.20 MT CPO: 31,847 MT PK: 7,961 MT <p>Until this assessment as per August 2024, unit of certification has produced:</p> <ul style="list-style-type: none"> FFB: 22,867 MT CPO: 5,493 MT PK: 1,351 MT <p>It can be concluded that there is no overproduction yet.</p> | Complied |
| 3.8.4 | The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform. | Unit of certification has registered in RSPO IT Platform. | Complied |

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| | | <ul style="list-style-type: none"> RSPO Membership Number: 1-0096-11-000-00 (Golden Agri Resources Ltd) Member name: PT Paramitra Internusa Pratama – Belian Mill PalmTrace Member ID: RSPO_PO1000003782 | |
| 3.8.5 | <p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 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 mill's procedures for the implementation of this standard. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. | <p>Unit of certification has written procedure and work instruction to ensure the implementation of all elements specified in these requirements, e.g:</p> <ol style="list-style-type: none"> PT Paramitra Internusa Pratama – Belian Mill refers to procedure "SOP Supply Chain Produk Bersertifikat Model Mass Balance No. PT PIP-BLNM/SOP/Rantai Pasok – MB/02 dated 10 January 2022. The procedure consists of scope of procedure; roles and responsibilities; working steps from receiving to product dispatch; processing; production monitoring; three-monthly report; transaction registration; document control. The procedure updated in January 2023 to include RSPO Rules on Market Communication and Claims 2022 as reference. PT Paramitra Internusa Pratama – Belian Mill is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain's general requirement and modular requirement, including training records. As per Procedure Supply Chain Certification Mass Balance No. PT PIP-BLNM/SOP/Rantai Pasok – MB/02 dated 10 January 2022 and Organization Structure of Traceability management system, the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill. Mill manager also has appointed head of administration as traceability officer. The Procedure Supply Chain Certification Mass Balance PT PIP-BLNM/SOP/Rantai Pasok – MB/02 dated 10 January 2022, Section 6.1 explains the process for FFB receiving, certified FFB and non- | Complied |

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| | | certified FFB recording; Section 6.3 explains the FFB grading and rejection. The mill uses supply chain Mass Balance Module, no segregation between the FFB that RSPO-certified and non-certified are allowed. | |
| 3.8.6 | <p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p> | <p>Internal audit procedure for RSPO SCCS implementation refers to "SOP Internal Audit No. SOP/SMART/UMUM/SADV/I/009" dated 1 July 2014. "Section 2.2.1 – Penyusunan Program Internal Audit" stated Internal Audit carried out minimum once per annum and possible to be added based on need.</p> <p>Section "2.4.10 Penyusunan Rencana Perbaikan dan Pencegahan" stated Unit Head will prepare and implement correction and corrective action.</p> <p>Internal audit for Supply Chain Requirement for Mill carried out along with P&C's. The last internal audit (2024) was taken on 9 – 13 September 2024. No noncompliance related to supply chain procedure and implementation raised during this assessment. The internal auditor has received training regarding RSPO P&C and Supply Chain Certification Standard in 2018 - 2020 and endorsed training RSPO P&C by Checkmark Training in June 2021.</p> <p>Unit of certification has held management review annually. The latest Management review was held on 17 September 2024 in meeting room Regional Controller (attended by 7 operation unit head). Management review meeting have discussed the following:</p> <ul style="list-style-type: none"> • Result of ISCC, ISPO, RSPO, OHS Internal audit • Result of Operational Internal Audit • Customer feedback • Process performance and product conformity | Complied |

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| | | <ul style="list-style-type: none"> • Mature upkeep • Others • Preventive and corrective actions • Follow up from previous management review • Change that could affect management system • Recommendation for improvement. | |
| 3.8.7 | <p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p> | <p>As explained above, Belian Mill (RSPO certificate No. RSPO 644391) received FFB from certified and noncertified sources as follows:</p> <ul style="list-style-type: none"> • Belian Estate/BLNE – PT Paramitra Internusa Pratama (RSPO certified) • Tengawang Estate/TNKE – PT Paramitra Internusa Pratama (RSPO Certified) • Belian Estate/BLNE – PT Paramitra Internusa Pratama (RSPO Noncertified) • Tengawang Estate/TNKE– PT Paramitra Internusa Pratama (RSPO Noncertified) • Belian Plasma/BLNA – PT Paramitra Internusa Pratama (RSPO Noncertified) • Kapuas Hulu Estate/KHLE – PT Persada Graha Mandiri (RSPO Noncertified) • Sungai Beran Estate/SBRE - PT Persada Graha Mandiri (RSPO Noncertified) • Kapuas Hulu Plasma/KHLA - PT Persada Graha Mandiri (RSPO Noncertified) • Muara Tawang Estate/MTNE – PT Kartika Prima Cipta (RSPO Noncertified) | Complied |

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| | | <ul style="list-style-type: none"> • Muara Tawang Plasma/MTNA - – PT Kartika Prima Cipta (RSPO Noncertified) <p>Belian Mill refers to procedure "SOP Supply Chain Produk Bersertifikat Model Mass Balance No. PT PIP-BLNM/SOP/Rantai Pasok – MB/02" dated 10 January 2022 stated:</p> <ul style="list-style-type: none"> • Section 6.1 explains the process for FFB receiving, certified FFB and non-certified FFB recording. Section 6.2 indicates the Weighbridge Clerk has responsibility to check delivery note from FFB source and print "Receiving Slip" based on FFB Delivery Note, covering information e.g. FFB source name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number. • Section 6.6 explains if the projection of certified product more than certified product claim, the mill will inform RSPO CB and RSPO IT system/Palmtrace of the projected overproduction. The communication will be assisted by Certification Department. • Section 6.3 explains the FFB grading and rejection. PT Paramitra Internusa Pratama – Belian Mill has a list of certified and non-certified oil palm plantation block. The block list was referring to <i>Note: Memorandum Regional Controller Region Semitau No. 025/RC/SMT/X/2022 dated 1 November 2022 related to transporting certified/uncertified FFB mechanism to Belian Mill. List of areas certified and non-certified areas along with map of Belian and Tengawang Estate attached. Based on updated database, total planted area 5,045.67 Ha; certified area 1,725.78 Ha; non-certified area 3,319.89 Ha.</i> • Non-conforming FFB and non-certified FFB will be downgraded to non-certified FFB. | |
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| | | <p>Records of incoming FFB certified source (Belian Estate – own estate):</p> <ul style="list-style-type: none"> • Weighbridge card G241 BLNM K 20432 No. A011523 049410 originated from Belian Estate; Date 23 September 2024; Division 2; total bunches 411; 1st weight 16,280 kg; 2nd weight 10,280 kg; 3rd weight 6,000 kg; Delivery Note 4720/TBS/02/24/09/W042; Transporter 3500126 PT Satrindo Jaya Agropalma; Driver Martinus Pade; Clerk Indra Gustian. <p>Records of incoming non-certified FFB sampled (Belian Estate – own estate):</p> <ul style="list-style-type: none"> • Weighbridge card G241 BLNM K 25115 No. B026959 049551 originated from Belian Estate; Date 24 September 2024; Division 1; total bunches 519; 1st weight 10,680 kg; 2nd weight 4,010 kg; 3rd weight 6,670 kg; Delivery Note 4720/TBS/01/24/09/A077; Transporter 3500126 PT Satrindo Jaya Agropalma; Driver Dani Alamsyah; Clerk Indra Gustian. <p>Until this assessment, there is no overproduction. Moreover, unit of certification also had a mechanism in place for handling non-conforming FFB in FFB grading procedure “SOP Penerimaan dan Pemeriksaan/Sortasi TBS dalam Instruksi Kerja Lampiran Pedoman Grading TBS No. LAMP/SMART/MCMD/I/TM-PMKS/01 rev.02” dated 10 February 2020.</p> | |
| 3.8.8 | <p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil</p> | <p>PT Paramitra Internusa Pratama – Belian Mill refers to procedure “SOP Supply Chain Produk Bersertifikat Model Mass Balance No. PT PIP-BLNM/SOP/Rantai Pasok – MB/02” dated 10 January 2022. Section 6.7 explains the product sales/dispatch starting from Delivery Order receiving, product dispatch process, weighing, delivery, registration of transaction.</p> | Complied |

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| | <p>palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. | <p>Unit of certification has documented the information related to the goods out can be seen on the shipping announcement. Sample taken:</p> <ol style="list-style-type: none"> Transaction code TR-cc96c2af-a47c: <ul style="list-style-type: none"> Shipping announcement TR-cc96c2af-a47c Seller: PT Paramitra Internusa Pratama – Belian Mill; Member ID: RSPO_PO1000003782; Seller Contract No: DIC/4750/010324/0002; Product Detail: CSPO; Supply Chain Model: Mass Balance; Mill Name: PT Paramitra Internusa Pratama – Belian Mill; Mill Country: Indonesia; Volume: 750.38 MT; Transport Detail: Transport Medium Water; Shipping B/L: 1 May 2023; Ship Name TK AS Glory 15; Transaction ID: TR-cc96c2af-a47c; Status: confirmed; Announced Date: 08 May 2024. Buyer Member Name: PT SMART Tbk – Tarjun Refinery; Member ID: RSPO_PO10000001622. Transaction code TR-1c304012-590c: <ul style="list-style-type: none"> Delivery order No. 4750/KER/4750/24/T006 dated 4 June 2024; Contact No. 4750KER475024T006; Product: Palm Kernel; Quantity: 496.19 MT; Buyer: PT Binasawit Abadi Pratama; Transporter: Satrindo Jaya Agropalma; certification information: RSPO MB RSPO 644391. Delivery Note No. M232 BLNM N 06829 dated 4 June 2024; Contact No. DIC/2450/060923/0003; Product: Palm Kernel. Total 63 delivery note attached. Weighbridge card No. G241 BLNM K 03425; No. A007168 02400; 1st weight 4,620 kg; 2nd weight 9,540 kg; net weight 4,920 kg; Goods Out: Palm Kernel; Seller Name: PT Paramitra Internusa Pratama – Belian Mill; Buyer name: PT Binasawit Abadi Pratama; Contact No. 4750KER475024T006; Delivery Note 4750/KER/LK/24/05/0854; Delivery Order | |
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| | | <p>4750/KER/4750/24/T006; Transporter; 3500126 PT Satrindo Jaya Agropalma; Driver Dani; Clerk: Resi Safitri.</p> <ul style="list-style-type: none"> Shipping announcement TR-1c304012-590c Seller: PT Paramitra Internusa Pratama – Belian Mill; Member ID: RSPO_PO1000003782; Seller Contract No: DIC/4750/010324/0002; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: PT Paramitra Internusa Pratama – Belian Mill; Mill Country: Indonesia; Volume: 496.19 MT; Transport Detail: Transport Medium Water; Shipping B/L: 14 June 2024; Ship Name TK Cemerlang X; Transaction ID: TR-1c304012-590c; Status: Confirmed; Announced Date: 27 June 2024. Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006577. <p>3. Transaction code TR-b6139816-2251:</p> <ul style="list-style-type: none"> Shipping announcement TR-b6139816-2251 Seller: PT Paramitra Internusa Pratama – Belian Mill; Member ID: RSPO_PO1000003782; Seller Contract No: DIC/4750/040424/0002; Product Detail: CSPO; Supply Chain Model: Mass Balance; Mill Name: PT Paramitra Internusa Pratama – Belian Mill; Mill Country: Indonesia; Volume: 745.95 MT; Transport Detail: Transport Medium Water; Shipping B/L: 09 June 2024; Ship Name TK AS Glory 18; Transaction ID: TR-b6139816-2251; Status: confirmed; Announced Date: 17 July 2024. Buyer Member Name: PT Ivo Mas Tunggal – Lubuk Gaung Refinery; Member ID: RSPO_PO10000003168. <p>4. Transaction code TR-c1267d09-57c4:</p> <ul style="list-style-type: none"> Shipping announcement TR-c1267d09-57c4 Seller: PT Paramitra Internusa Pratama – Belian Mill; Member ID: RSPO_PO1000003782; Seller Contract No: DIC/4750/030724/0002; Product Detail: CSPO; Supply Chain | |
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| | | Model: Mass Balance; Mill Name: PT Paramitra Internusa Pratama – Belian Mill; Mill Country: Indonesia; Volume: 507.53 MT; Transport Detail: Transport Medium Water; Shipping B/L: 13 July 2024; Ship Name TK AS Glory 19; Transaction ID: TR-c1267d09-57c4; Status: confirmed; Announced Date: 06 September 2024. Buyer Member Name: PT SMART Tbk – Tarjun Refinery; Member ID: RSPO_PO10000001622. | |
| 3.8.9 | <p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p> | <p>The Mill will outsource its products transportation to the third parties and has contractual agreements.</p> <p>CSPO transporter handled by PT Ponti Sarana Utama (Agreement No. 001/PIP/BLNM/08/2024-PK dated 1 August 2024, valid thru 31 July 2025), while CSPK transportation handled by PT BSA Logistic Indonesia (Agreement No. 001/PIP/BLNM/06/2024-PK dated 1 August 2024, valid thru 31 July 2025).</p> <p>To ensure the contractors complies with the RSPO Supply Chain, there were Pact of Integrity dated 7 October 2022 for these contractors, which include clauses of obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to ensure the purity of certified product delivered during the distribution, as well as the willingness to be observed by Certification Body to verify the compliance. Other than that, the Mill has SOP of Contractor Control (No. SOP/SMART/UMUM/SADV/I/006 dated 1 July 2014) to monitor the compliance of contractors.</p> | Complied |

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| 3.8.10 | The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products. | <p>The names and contact details of all contractors used has been recorded. For example:</p> <p>PT Ponti Sarana Utama:</p> <ul style="list-style-type: none"> Contact person: Andy Setiawan Tai Address: Jln. Tanjungpura No. 247, Pontianak, West Kalimantan, Indonesia. <p>PT BSA Logistic Indonesia:</p> <ul style="list-style-type: none"> Contact person: Thomas Wenas Address: East Jakarta, Indonesia | Complied |
| 3.8.11 | The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products. | The site committed to inform CB related name and contact details of any new contractors to CB. PT Tapan Nadenggan - Hanau POM has informed to CB before audit conducted with pre information audit checklist submission to CB. | Complied |
| 3.8.12 | <p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> | <p>PT Paramitra Internusa Pratama – Belian Mill refers to procedure “SOP Supply Chain Produk Bersertifikat Model Mass Balance No. PT.SMS-PPNM/SOP/27 rev.09”, dated 4 January 2023. The procedure explains all aspects of supply chain and traceability scope in PT Paramitra Internusa Pratama: consist of FFB receiving, weighing, FFB quality checking, processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for delivery; Shipping instruction and preparation; CPO and PK stock balancing post-shipping; document control.</p> <p>Belian Mill; maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>Evidence of minimum 2 years retention times can be seen at document weighbridge card date 1 July 2022 No. E214 BLNM B 05374 No. A027652</p> | Complied |

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| | <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p> | <p>032611; 1st weight 20,270 kg; 2nd weight 10,230 kg; net weight 10,040 kg; Goods Out: Palm Kernel; Sender: Tengawang Estate Division 3; Total Bunches 876; Delivery Note 4721/TBS/03/22/08/S004; Transporter 3500126 Satrindo Jaya Agro Palma; Driver Oki Lukmana; Clerk Tina Anggraini.</p> <p>The procedure of Supply Chain Section 7 (Documentation) stipulates storage and control of recording related to product sales, transportation until product delivery must be stored according to procedure of document and record control (SOP/SMART/UMUM/SADV/I/001 – Section 2.4.12.e) with minimum retention period of 10 years.</p> <p>Audit team verified the implementation of the procedure through checking delivery dockets and weighbridge.</p> <p>a. PT Paramitra Internusa Pratama – Belian Mill maintains mass balance spreadsheet to monitor the proportion of certified FFB, non-certified FFB, certified CPO, non-certified CPO, certified PK and non-certified PK.</p> <p>b. PT Paramitra Internusa Pratama – Belian Mill through mass balance spreadsheet monitors the proportion of certified CPO and certified PK.</p> <p>c. Based on document review against Belian Mill mass balance spreadsheet period 2023 - 2024 (since the first date of certification November 2023 – August 2024), CH has never sold short.</p> <p>As per Mass Balance Report August 2024 obtain information that mill has positive stock 420.83 MT (CPO) and 133.50 MT (PK). It can be concluded there is no short selling during this audit.</p> | |
| 3.8.13 | Extraction Rate | According to the long-term projection, top management has set the extraction rate for the next 5 years where OER 25.5% and KER 6.00%. | Complied |

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| | The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently. | Based on daily production report above, the extraction rate (OER/KER) reported and updated in daily basis. Since November 2023 – August 2024 is OER is 24.02%; KER is 5.91%. The extraction rate updated in a real time basis through daily production report. | |
| 3.8.14 | Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate. | According to the long-term projection, top management has set the extraction rate for the next 5 years where OER 25.5% and KER 6.00%. Based on daily production report above, the extraction rate (OER/KER) reported and updated in daily basis. Since November 2023 – August 2024 is OER is 24.02%; KER is 5.91%. The extraction rate updated in a real time basis through daily production report. | Complied |
| 3.8.15 | Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation. | PT Paramitra Internusa Pratama – Belian Mill uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Belian and Tengawang Estate). Thus, this indicator is not applicable. | Not Applicable |
| 3.8.16 | Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform. | PT Paramitra Internusa Pratama – Belian Mill refers to procedure “SOP Supply Chain Produk Bersertifikat Model Mass Balance No. PT PIP-BLNM/SOP/Rantai Pasok – MB/02” dated 10 January 2022. Section 6.7 explains the product sales/dispatch starting from Delivery Order receiving, product dispatch process, weighing, delivery, registration of transaction. Unit of certification has documented the information related to the goods out can be seen on the shipping announcement. Sample taken: 1. Transaction code TR-cc96c2af-a47c: <ul style="list-style-type: none"> Shipping announcement TR-cc96c2af-a47c Seller: PT Paramitra Internusa Pratama – Belian Mill; Member ID: RSPO_PO1000003782; Seller Contract No: | Complied |

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| | | <p>DIC/4750/010324/0002; Product Detail: CSPO; Supply Chain Model: Mass Balance; Mill Name: PT Paramitra Internusa Pratama – Belian Mill; Mill Country: Indonesia; Volume: 750.38 MT; Transport Detail: Transport Medium Water; Shipping B/L: 1 May 2023; Ship Name TK AS Glory 15; Transaction ID: TR-cc96c2af-a47c; Status: confirmed; Announced Date: 08 May 2024. Buyer Member Name: PT SMART Tbk – Tarjun Refinery; Member ID: RSPO_PO10000001622.</p> <p>2. Transaction code TR-1c304012-590c:</p> <ul style="list-style-type: none"> Shipping announcement TR-1c304012-590c Seller: PT Paramitra Internusa Pratama – Belian Mill; Member ID: RSPO_PO1000003782; Seller Contract No: DIC/4750/010324/0002; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: PT Paramitra Internusa Pratama – Belian Mill; Mill Country: Indonesia; Volume: 496.19 MT; Transport Detail: Transport Medium Water; Shipping B/L: 14 June 2024; Ship Name TK Cemerlang X; Transaction ID: TR-1c304012-590c; Status: Confirmed; Announced Date: 27 June 2024. Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006577. <p>3. Transaction code TR-b6139816-2251:</p> <ul style="list-style-type: none"> Shipping announcement TR-b6139816-2251 Seller: PT Paramitra Internusa Pratama – Belian Mill; Member ID: RSPO_PO1000003782; Seller Contract No: DIC/4750/040424/0002; Product Detail: CSPO; Supply Chain Model: Mass Balance; Mill Name: PT Paramitra Internusa Pratama – Belian Mill; Mill Country: Indonesia; Volume: 745.95 MT; Transport Detail: Transport Medium Water; Shipping B/L: 09 June 2024; Ship Name TK AS Glory 18; Transaction ID: TR-b6139816-2251; Status: confirmed; Announced Date: 17 July | |
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| | | <p>2024. Buyer Member Name: PT Ivo Mas Tunggal – Lubuk Gaung Refinery; Member ID: RSPO_PO10000003168.</p> <p>4. Transaction code TR-c1267d09-57c4:</p> <ul style="list-style-type: none"> Shipping announcement TR-c1267d09-57c4 Seller: PT Paramitra Internusa Pratama – Belian Mill; Member ID: RSPO_PO1000003782; Seller Contract No: DIC/4750/030724/0002; Product Detail: CSPO; Supply Chain Model: Mass Balance; Mill Name: PT Paramitra Internusa Pratama – Belian Mill; Mill Country: Indonesia; Volume: 507.53 MT; Transport Detail: Transport Medium Water; Shipping B/L: 13 July 2024; Ship Name TK AS Glory 19; Transaction ID: TR-c1267d09-57c4; Status: confirmed; Announced Date: 06 September 2024. Buyer Member Name: PT SMART Tbk – Tarjun Refinery; Member ID: RSPO_PO10000001622. <p>During this assessment, there is a record of removing stock (199.30 MT PK) that sold conventionally.</p> | |
| 3.8.17 | <p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p> | <p>PT Paramitra Internusa Pratama – Belian Mill has not made claims regarding the support of RSPO certified oil palm products. However, the organization aware about the RSPO Rules on Market Communications and Claims.</p> | Complied |
| General corporate communications | | | |
| 4.1 | <p>A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a “non-product related” claim.</p> | <p>PT Paramitra Internusa Pratama – Belian Mill did not conduct corporate communication. Corporate communications are conducted by Golden Agri-Resources (GAR) as RSPO member with membership No. 1-0096-11-000-00, member since 30 January 2005 on website: https://goldenagri.com.sg.</p> | Complied |

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| 4.2 | In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership | In corporate communication, GAR has display its RSPO membership status, display a link to the RSPO web address, stated that GAR support the work of the RSPO and stated GAR's history with regard to the RSPO. GAR did not use RSPO trademark on the website. | Complied |
| 4.3 | Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat. | On the website, GAR does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products. | Complied |
| 4.4 | In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products. | On the website, GAR ensure that all communication is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products. | Complied |
| 4.5 | Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include: <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "We are RSPO certified. Ask us for our RSPO certified products." | On the website, GAR ensure that all communication is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products. | Complied |

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| 4.6 | <p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p> | GAR has display its RSPO membership status and display a link to the RSPO web address. Thus, it is verified that the unit of certification is one of the RSPO members. | Complied |
| Product-specific communications | | | |
| 5.1 General | | | |
| 5.1.1 | Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. | PT Paramitra Internusa Pratama – Belian Mill only stated in sales documents, e.g., Sales Contract, Delivery Order and Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK with Mass Balance Module. The communication is mainly of the RSPO certificate number and product description. | Complied |
| 5.1.2 | Product-specific communications are voluntary. | PT Paramitra Internusa Pratama – Belian Mill product specification communications already stated on shipping information such as FFA rate and product type (CPO or PK). | Complied |

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| 5.1.3 | Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself. | RSPO label is not displayed on product-specific communications. | Complied |
| 5.1.4 | Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication. | PT Paramitra Internusa Pratama – Belian Mill does not use any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products | Complied |
| 5.1.5 | <p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. | PT Paramitra Internusa Pratama – Belian Mill is a palm oil mill implementing RSPO P&C, not a retailers, traders or distributors. | Not Applicable |
| 5.1.6 | Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. | PT Paramitra Internusa Pratama – Belian Mill is a palm oil mill implementing RSPO P&C, not a retailers, traders or distributors. | Not Applicable |

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| 5.2 Off pack claims | | | |
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| 5.2.1 | Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made. | PT Paramitra Internusa Pratama – Belian Mill only stated in sales documents, e.g., Sales Contract, Delivery Order and Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK with Mass Balance Module. The communication is mainly of the RSPO certificate number and product description. | Complied |
| 5.2.2 | When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made. | PT Paramitra Internusa Pratama – Belian Mill stated in sales documents, e.g., Sales Contract, Delivery Order and Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK with Mass Balance Module, and RSPO certified number is available. | Complied |
| 5.2.3 | Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. | PT Paramitra Internusa Pratama – Belian Mill is a palm oil mill implementing RSPO P&C, not a distributor or wholesaler. | Not Applicable |
| 5.3 On pack claims | | | |
| 5.3.1 | Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the | PT Paramitra Internusa Pratama – Belian Mill is an RSPO certificate holder with certificate number RSPO 644391, originally issued by BSI Services Malaysia Sdn Bhd on 28 November 2023. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached. | Complied |

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| | product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D. | | |
| 5.3.2 | <p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p> | PT Paramitra Internusa Pratama – Belian Mill is an RSPO certificate holder with certificate number RSPO 644391, originally issued by BSI Services Malaysia Sdn Bhd on 28 November 2023. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached. | Complied |
| | <p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p> | PT Paramitra Internusa Pratama – Belian Mill is an RSPO certificate holder with certificate number RSPO 644391, originally issued by BSI Services Malaysia Sdn Bhd on 28 November 2023. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached. | Complied |
| | <p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p> | PT Paramitra Internusa Pratama – Belian Mill is an RSPO certificate holder with certificate number RSPO 644391, originally issued by BSI Services Malaysia Sdn Bhd on 28 November 2023. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached. | Complied |
| | <p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p> | PT Paramitra Internusa Pratama – Belian Mill is an RSPO certificate holder with certificate number RSPO 644391, originally issued by BSI Services Malaysia Sdn Bhd on 28 November 2023. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached. | Complied |

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| 5.3.3 | On pack claims shall not include information about the claimant's RSPO membership status. | PT Paramitra Internusa Pratama – Belian Mill communication has not stated information about the claimant's RSPO membership status. | Complied |
| 5.3.4 | Members shall not communicate to consumers information about their suppliers' RSPO membership status. | PT Paramitra Internusa Pratama – Belian Mill communication has not stated information about the claimant's RSPO membership status. | Complied |
| 5.3.5 | Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient. | There is no RSPO Label used. | Complied |
| 5.3.6 | All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal. | There is no on pack claim used. | Complied |
| MODULE B – MASS BALANCE SPECIFIC RULES | | | |
| Mass Balance palm oil content | | | |
| | 95% of the palm oil content must be RSPO MB-certified. | The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content. | Complied |
| | If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume. | The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content. | Complied |
| Messaging | | | |
| | Messaging ALLOWED in storytelling in product-specific communications includes: <ul style="list-style-type: none"> [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. | PT Paramitra Internusa Pratama – Belian Mill did not use the RSPO trademark and/or RSPO label in the product. The mill sells its product in bulk. Not applicable. | Not Applicable |

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| | The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. | | |
| Product-Specific Communications Labelling | | | |
| | <p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". | <p>PT Paramitra Internusa Pratama – Belian Mill did not use the RSPO trademark and/or RSPO label in the product. The mill sells its product in bulk.</p> <p>Not applicable.</p> | Not Applicable |
| Principle 4: Respect community and human rights and deliver benefit | | | |
| Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed. | | | |
| Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders. | | | |
| 4.1.1 | <p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p> | <p>Since 2019 has been determined by Mr. Haskarlianus Pasang (Head of Policy and Compliance), there has been no change in human rights policy, i.e. The policy relating to human rights, there are 11 statements related to the human right.</p> <p>Particularly related to Human Right Defender (HRD) is describe clearly on point 9, stating that: <i>"Perusahaan menghormati dan melindungi hak-hak pelapor pelanggaran dan pembela hak asasi manusia."</i></p> <p>The company's policy is also published using posters at strategic locations in the plantations (Belian Estate, Tengkwang Estate and Belian Mill).</p> | Complied |

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| | | <ul style="list-style-type: none"> - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 24 – 28 June 2024 at Tengawang Estate attended by 267 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 17 May, 9 September, 30 July and 26 July 2024 at Belian Estate attended by 75 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 29 February 2024 at Belian Mill attended by 27 participants <p>According to interview with sample of workers during audit, it is declared that policy always disseminated during muster morning. For stakeholders, dissemination of the policy through email and notice board at village office.</p> | |
| 4.1.2 | <p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p> | <p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. This can be proven during stakeholder consultation and sample of workers interviewed at the time of field visit.</p> | Complied |
| Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties. | | | |
| 4.2.1 | <p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p> | <p>Unit of Certification established procedure “<i>SOP Penanganan Keluhan dan Ketidakpuasan</i> (SOP/SMART/GIMS-SCMD/USDV/I/001, R.2, dated 11 April 2017)”. Scope of the procedure covering complaints and dissatisfaction records, classification, communication, planning, resolution, monitoring and reporting of complaint and dissatisfaction handling, including form of any sexual harassment to workers nor children sourced from internal and external parties.</p> | Complied |

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| | | <p>This procedure is used for handling of any complaints and dissatisfaction to all affected parties. Within the procedure stated:</p> <p>This procedure is used for handling of any complaints and dissatisfaction to all affected parties. Within the procedure stated:</p> <ul style="list-style-type: none"> Any complaints (direct or indirectly) receives and record in Form F/SMART/GIMS-SCMD/USDV/I/001/001 by social officer or administration head. Entire data and complaint information can be publicly available or classify to affected parties upon approval by reporter. Unit of certification ensure anonymity of complainants and whistle-blower with aims to reducing retaliation risks. Complaints and disputes can be delivered by mailbox to Head Office, or by phone through hotline and app or email. Response shall be made within 14 working days after complaints or disputes receives. If complaints and dissatisfaction are submitted verbally (the complainant cannot read or write) or by telephone, the recipient of the report must assist in writing/recording the complaint. | |
| 4.2.2 | <p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p> | <p>Procedure “<i>SOP Penanganan Keluhan dan Ketidakpuasan</i> (SOP/SMART/GIMS-SCMD/USDV/I/001, R.2, dated 11 April 2017)” is in place and accommodate inclusivity for illiterate parties. The procedure describes that the process of delivering and handling complaints and grievances internally and externally.</p> <p>Complaints can be submitted directly to the plantation unit either verbally or in writing.</p> <p>There are several channels for submitting complaints, namely:</p> <ul style="list-style-type: none"> Box complaints and suggestions (has been set in front of office) Phone or a short message | Complied |

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| | | <ul style="list-style-type: none"> • Public media • Certification agencies • Reporting non-governmental organization (NGO) • Head Office with the address: Sinarmas Land Plaza, Tower II, lantai 34, Jl. MH. Thamrin No. 51, Jakarta 10350, Indonesia Email: grievance@sinarmas-agri.com Phone: +62 882 1290 9203 <p>In the SOP also mentioned that the company guarantees the anonymity of the whistle-blower. Head clerk is responsible for record all complaints and grievances that exist both orally and in writing from the external. Responses to the complaint and dissatisfaction is given as soon as possible and not later than 14 working days after the issue received. Based on interviews with management, if there is no solution in the complaint mechanism, can be brought to the RSPO Complaint System.</p> | |
| 4.2.3 | <p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p> | <p>Whole recording and handling of related complaints recorded in the Monitoring Form Handling Complaints and dissatisfaction document number: F/SMART/SIGSCSRD/SADV/003/001.</p> <p>According to interviews with sample of workers during field visit and communities there are no complaints or dissatisfaction with the company.</p> | Complied |
| 4.2.4 | <p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p> | <p>The company has set the system to handle complaints and grievances in the SOP of Complaints and Grievance Handling No. SOP/SMART/SUST/IV/003, dated 8 March 2022. The SOP has set that the complaint resolution is address in deliberation in advance. If no deal achieved, every party might deliver the case to the lawsuits or RSPO complaint panel.</p> | Complied |

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| | | During interview with stakeholders (Governmental, communities, contractors), there was no complaints occurs for the last five years. | |
| Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities. | | | |
| 4.3.1 | Contributions to community development that are based on the results of consultation with local community are demonstrated. - Minor compliance - | <p>PT Paramitra Internusa Pratama has established a Long-Term Plan for CSR activities. CSR Strategic Plan Report for the period 2023-2027. PT Paramitra Internusa Pratama gathered the social issue from the local communities through the consultation and reflected on CSR plan period 2024. There are several programs for developing local communities Corporate Social Responsibilities period 2024 in each aspect as follows:</p> <p><u>Education:</u></p> <ul style="list-style-type: none"> - Improvement of other learning and teaching facilities (textbooks, learning media, library books) - Provision of scholarships for poor students - Provision of support for school extracurricular activities - Scholarships for underprivileged students in Sekedau 2 Village, Tua' Abana Village - Scholarships for underprivileged students in Nanga Bian Village, Tua' Abana Village <p><u>Health:</u></p> <ul style="list-style-type: none"> - Provision of supporting facilities and infrastructure in health units in business units - Posyandu Cadre Training - Assistance in Handling Malnutrition - Hernia surgery, Cleft lip surgery, Cataract surgery & Eye examination | Complied |

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| | | <p><u>Economy:</u></p> <ul style="list-style-type: none"> - Formation and Strengthening of Business Groups - Assistance for residents affected by floods <p><u>Infrastructure:</u></p> <ul style="list-style-type: none"> - Repair and maintenance of infrastructure that has been built - Routine watering of dusty roads in the community area living around the production access of the business unit - Road opening - Bridge opening and culverts - Drainage construction - Road filling towards Dsn. Sekedau 1 <p><u>Arts and Culture:</u></p> <ul style="list-style-type: none"> - Donating to the Community Around the Business Unit According to the Needs and Capabilities of the Business Unit - Assistance of boards to members of the Danramil (military rayon) of Semitau for emergency bridge purposes" - Assistance for the inauguration of the Church and Betang House of Bian Village - Provision of financial assistance for Gawai Village Jentawang, Batu Ampar Village - Provision of scholarships for underprivileged students in Sungai Putat Village, Sentabai Village" - Provision of scholarships for underprivileged students in Sekedau Village. | |
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| | | <p>Realization of the CSR program for the 2024 period, as follows:</p> <table><tr><th>No</th><th>Activities</th><th>Date</th><th>Location (Village/District/Su District)</th><th>Funds (IDR)</th></tr><tr><td>1</td><td>Cleaning of Water Hyacinth in Jentu River</td><td>03-Feb-24</td><td>Sentabai Village, Jentu Village</td><td>IDR 1,500,000</td></tr><tr><td>2</td><td>Community development program for Patin fish cage cultivation in Nanga Seberuang Village</td><td>26-Feb-24</td><td>Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan</td><td>IDR 69,240,000</td></tr><tr><td>3</td><td>Assistance in Procurement of 1 PK AC unit</td><td>22 Maret 2024</td><td>Sub District of Semitau</td><td>IDR 4,550,000</td></tr><tr><td>4</td><td>Cheap Cooking Oil Bazaar</td><td>02-Apr-24</td><td>Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan</td><td>IDR 14,250,000</td></tr><tr><td>5</td><td>Provision of basic necessities for flood-affected communities</td><td>18-Apr-24</td><td>Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan</td><td>IDR 19,569,000</td></tr><tr><td>6</td><td>Funding assistance for Dayak Gawai Proposal in Na Seberuang Village</td><td>27 Mei 2023</td><td>Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan</td><td>IDR 500,000</td></tr><tr><td>7</td><td>Funding assistance for Dayak Gawai Proposal in Na Lemedak Village</td><td>12 Juli 2024</td><td>Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan</td><td>IDR 1,000,000</td></tr><tr><td>8</td><td>Funding assistance for Dayak Gawai Proposal in Na Seberuang Village</td><td>12 Juli 2024</td><td>Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan</td><td>IDR 500,000</td></tr><tr><td>9</td><td>Funding assistance for Dayak Gawai Proposal in Semitau Hilir Village</td><td>13 Juli 2024</td><td>Semitau Hilir Village, Semitau District, Kapuas Hulu Regency, West Kalimantan</td><td>IDR 1,500,000</td></tr><tr><td>10</td><td>Funding assistance for Semitau District Cultural Festival Contingent</td><td>14 Juli 2024</td><td>Sub District of Semitau</td><td>IDR 1,500,000</td></tr><tr><td>11</td><td>Funding assistance for Na Lemedak Village Community Mission</td><td>16 Juli 2024</td><td>Nanga Lemedak Village</td><td>IDR 1,500,000</td></tr><tr><td>12</td><td>Implementation assistance for August 17, 2024 in Semitau District</td><td>16 Agustus 2024</td><td>Sub District of Semitau</td><td>IDR 2,500,000</td></tr><tr><td>13</td><td>Implementation assistance for August 17, 2024 in Nanga Lemedak Village</td><td>24 Agustus 2023</td><td>Nanga Lemedak Village</td><td>IDR 500,000</td></tr><tr><td>14</td><td>Implementation assistance for August 17, 2024 in Nanga Seberuang Village</td><td>24 Agustus 2023</td><td>Pondok 1 BLNE, Na. Seberuang Village, Sub Semitau District</td><td>IDR 1,000,000</td></tr></table> <p>Based on interviews with village representatives (Village Head/ community leaders), they have stated that they have felt the benefits of the realization of CSR in 2024.</p> | No | Activities | Date | Location (Village/District/Su District) | Funds (IDR) | 1 | Cleaning of Water Hyacinth in Jentu River | 03-Feb-24 | Sentabai Village, Jentu Village | IDR 1,500,000 | 2 | Community development program for Patin fish cage cultivation in Nanga Seberuang Village | 26-Feb-24 | Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 69,240,000 | 3 | Assistance in Procurement of 1 PK AC unit | 22 Maret 2024 | Sub District of Semitau | IDR 4,550,000 | 4 | Cheap Cooking Oil Bazaar | 02-Apr-24 | Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 14,250,000 | 5 | Provision of basic necessities for flood-affected communities | 18-Apr-24 | Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 19,569,000 | 6 | Funding assistance for Dayak Gawai Proposal in Na Seberuang Village | 27 Mei 2023 | Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 500,000 | 7 | Funding assistance for Dayak Gawai Proposal in Na Lemedak Village | 12 Juli 2024 | Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 1,000,000 | 8 | Funding assistance for Dayak Gawai Proposal in Na Seberuang Village | 12 Juli 2024 | Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 500,000 | 9 | Funding assistance for Dayak Gawai Proposal in Semitau Hilir Village | 13 Juli 2024 | Semitau Hilir Village, Semitau District, Kapuas Hulu Regency, West Kalimantan | IDR 1,500,000 | 10 | Funding assistance for Semitau District Cultural Festival Contingent | 14 Juli 2024 | Sub District of Semitau | IDR 1,500,000 | 11 | Funding assistance for Na Lemedak Village Community Mission | 16 Juli 2024 | Nanga Lemedak Village | IDR 1,500,000 | 12 | Implementation assistance for August 17, 2024 in Semitau District | 16 Agustus 2024 | Sub District of Semitau | IDR 2,500,000 | 13 | Implementation assistance for August 17, 2024 in Nanga Lemedak Village | 24 Agustus 2023 | Nanga Lemedak Village | IDR 500,000 | 14 | Implementation assistance for August 17, 2024 in Nanga Seberuang Village | 24 Agustus 2023 | Pondok 1 BLNE, Na. Seberuang Village, Sub Semitau District | IDR 1,000,000 | |
|---|---|---|--|----------------|------|---|-------------|---|---|-----------|---------------------------------|---------------|---|--|-----------|---|----------------|---|---|---------------|-------------------------|---------------|---|--------------------------|-----------|--|----------------|---|---|-----------|--|----------------|---|---|-------------|--|-------------|---|---|--------------|--|---------------|---|---|--------------|--|-------------|---|--|--------------|---|---------------|----|--|--------------|-------------------------|---------------|----|---|--------------|-----------------------|---------------|----|---|-----------------|-------------------------|---------------|----|--|-----------------|-----------------------|-------------|----|--|-----------------|--|---------------|--|
| No | Activities | Date | Location (Village/District/Su District) | Funds (IDR) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Cleaning of Water Hyacinth in Jentu River | 03-Feb-24 | Sentabai Village, Jentu Village | IDR 1,500,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Community development program for Patin fish cage cultivation in Nanga Seberuang Village | 26-Feb-24 | Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 69,240,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Assistance in Procurement of 1 PK AC unit | 22 Maret 2024 | Sub District of Semitau | IDR 4,550,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Cheap Cooking Oil Bazaar | 02-Apr-24 | Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 14,250,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Provision of basic necessities for flood-affected communities | 18-Apr-24 | Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 19,569,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Funding assistance for Dayak Gawai Proposal in Na Seberuang Village | 27 Mei 2023 | Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 500,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Funding assistance for Dayak Gawai Proposal in Na Lemedak Village | 12 Juli 2024 | Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 1,000,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | Funding assistance for Dayak Gawai Proposal in Na Seberuang Village | 12 Juli 2024 | Na Lemedak Village and Na Seberuang Village, District. Semitau District Kapuas Hulu, West Kalimantan | IDR 500,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Funding assistance for Dayak Gawai Proposal in Semitau Hilir Village | 13 Juli 2024 | Semitau Hilir Village, Semitau District, Kapuas Hulu Regency, West Kalimantan | IDR 1,500,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Funding assistance for Semitau District Cultural Festival Contingent | 14 Juli 2024 | Sub District of Semitau | IDR 1,500,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | Funding assistance for Na Lemedak Village Community Mission | 16 Juli 2024 | Nanga Lemedak Village | IDR 1,500,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | Implementation assistance for August 17, 2024 in Semitau District | 16 Agustus 2024 | Sub District of Semitau | IDR 2,500,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 13 | Implementation assistance for August 17, 2024 in Nanga Lemedak Village | 24 Agustus 2023 | Nanga Lemedak Village | IDR 500,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 14 | Implementation assistance for August 17, 2024 in Nanga Seberuang Village | 24 Agustus 2023 | Pondok 1 BLNE, Na. Seberuang Village, Sub Semitau District | IDR 1,000,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.4.1 | (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance - | PT Paramitra Internusa Pratama as unit of certification have already comply with relevant regulations as below: <ul style="list-style-type: none">Deed of Establishment: "Akta Pendirian Perseroan Terbatas PT. Paramitra Internusa Pratama No. 05, tanggal 8 June 2006". Approval Ministry of Law and Human Rights Nomor: W7-05304 HT.01.01-TH.2007, dated 10 May 2007. | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <ul style="list-style-type: none"> • Changes of Deed: "Berita Acara RUPS Luar Biasa PT Paramitra Internusa Pratama" No. 10, dated 1 Apr 2019. Approval Ministry of Law and Human Rights Nomor: AHU-AH.01.03-0222755, dated 28 April 2019. • Taxpayer Number/NPWP: 02.275.842.9-021.000, registered since 30 August 2006. • Location Permit: <ul style="list-style-type: none"> a) "SK Bupati Kapuas Hulu Nomor 14 Tahun 2007" regarding Location Permit PT Paramitra Internusa Pratama for area \pm 20,000 Ha. b) 1st Revision of location permit "SK Bupati Kapuas Hulu Nomor 139 Tahun 2009", dated 12 May 2009 regarding 1st extension permit for area \pm 20,000 Ha. c) 2nd Revision of location permit "SK Bupati Kapuas Hulu Nomor 305 Tahun 2012", dated 12 July 2012 regarding 2nd extension permit for area \pm 20,000 Ha. • Environmental Permit / AMDAL/ Izin Lingkungan: refer to "Keputusan Bupati Kapuas Hulu Nomor 289 Tahun 2006", dated 22 December 2006 regarding "Kelayakan Lingkungan Kegiatan Perkebunan Kelapa Sawit PT Paramitra Internusa Pratama" in effective area 12,000 Ha. • Timber Utilization Permit (Izin Pemanfaatan Kayu): "Surat Gubernur Kalimantan Barat Nomor: 522/3457/DISHUT/2008", dated 28 November 2008 regarding Principle Permit of Timber within Non-Forest Designated Area (APL) of PT Paramitra Internusa Pratama. The permit describes that area of PT Paramitra Internusa Pratama \pm 20,000 Ha clearly located in Non-Forest Designated Area (Kawasan Budidaya Non Kehutanan/Area Penggunaan Lain) refer to Ministry of Forestry decree SK Menhutbun Nomor: 259/Kpts-II/2000, Forest Designated Area of Kalimantan Barat. | |
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| | | <ul style="list-style-type: none"> • Plantation Permit: "Keputusan Bupati Kapuas Hulu Nomor 239 Tahun 2012", dated 12 July 2012 regarding "Izin Usaha Perkebunan" of PT Paramitra Internusa Pratama for area 20,000 Ha and Mill capacity 80 MT/hour. • Land Title (HGU): "Keputusan Menteri Agraria dan Tata Ruang/BPN Nomor: 35/HGU/KEM-ATR/BPN/2015", dated 7 May 2015 regarding Land Title of PT Paramitra Internusa Pratama. There are eight (8) parcels of land title with total area is 13,173.93 Ha. Land title certificate as below: <ol style="list-style-type: none"> 1. Land certificate No. 00039, issued 26 June 2015, validity 7 May 2050. Hectarage: 362.26 Ha (Tengkawang Estate) 2. Land certificate No. 00040, issued 26 June 2015, validity 7 May 2050. Hectarage: 222.46 Ha (Tengkawang Estate) 3. Land certificate No. 00041, issued 26 June 2015, validity 7 May 2050. Hectarage: 3,192.09 Ha (Tengkawang Estate and Belian Estate) 4. Land certificate No. 00042, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,289.74 Ha (Tengkawang Estate and Belian Estate) 5. Land certificate No. 00043, issued 26 June 2015, validity 7 May 2050. Hectarage: 2.54 Ha (Tengkawang Estate) 6. Land certificate No. 00044, issued 26 June 2015, validity 7 May 2050. Hectarage: 1.50 Ha (Tengkawang Estate) 7. Land certificate No. 00045, issued 26 June 2015, validity 7 May 2050. Hectarage: 4,995.26 Ha (Tengkawang Estate and Belian Estate) 8. Land certificate No. 00046, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,108.08 Ha (Tengkawang Estate) | |
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| | | <ul style="list-style-type: none"> Building Rights (HGB) for Belian POM, covering area 15.14 Ha refer to legal documents as below: <ol style="list-style-type: none"> Certificate HGB No. 00002, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 24,406 m² (2.44 Ha), land use for POME pond. Certificate HGB No. 00003, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 66,189 m² (6.62 Ha), land use for Mill. Certificate HGB No. 00004, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 60,845 m² (6.08 Ha), land use for Reservoir. <p>Total area under HGU/HGB of this certification is 13,189.07 Ha.</p> <p>Note:</p> <ul style="list-style-type: none"> Total of certification scope refer to table 5 and 6. Based on memorandum Regional Controller Region Semitau No. 025/RC/SMT/X/2022 dated 1 November 2022 related to transporting certified/uncertified FFB mechanism to Belian Mill. List of areas certified and non-certified areas along with map of Belian and Tengawang Estate attached. Based on updated database, total planted area 5,045.67 Ha; certified area 1,725.78 Ha; non-certified area 3,319.89 Ha (self-downgraded certified areas for simplify supply chain implementation). | |
| 4.4.2 | <p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> Minor compliance - <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha in period 2007 - 2019. There was no more compensation process afterward.</p> <p>FPIC procedure of PT. Paramitra Internusa Pratama refers to "SOP Penanganan Pengaduan dan Konflik (SOP/SMART/SUST/IV/003" Rev.3 dated 8 Mar 2022.</p> <p>Scope of the procedure: record of grievance and conflict, levelling, communication, planning, handling, monitoring, and reporting grievance and conflict handling sources from internal and external parties. This</p> | Complied |

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| | <p>provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> | <p>procedure is included for sexual harassment handling and violence occurs in unit of certification/company.</p> <p>Receiving of complaint/grievance and conflict handling through suggestion box, telephone/sms, public media, CB, NGO's, email: gievance@sinar-mas-agri.com and mailing address.</p> <p>Stages:</p> <ul style="list-style-type: none"> • Receiving and Record of Complaint and Conflict (verbal or written, includes illiterate parties and disabilities, protection of anonymity and whistle-blower, HRD). • Levelling of complaint/grievance and conflict. Low: no restriction; High: potential restriction. • Authority and approval of complaint/grievance and conflict management plan. Low: authority is EM/MM, approval is RC/PC; High: authority is RC/PC, approval is COO/VPA/VPM/Deputy CEO/CEO/MDOps/HoU. • Conflict and Grievance Handling. Respond of conflict is max. 14 days, if more than 14 days EM/MM shall provide initial notification. • Monthly report shall made by SPO assistant and filled in Grievance Handling as form No. F/SMART/SUST/IV/003/003. <p>Unit of certification has demonstrated evidence of land compensation, based on agreement, e.g.:</p> <ul style="list-style-type: none"> • Minutes of handover of land belonging to Riki Darmawan Surya for 1.77 hectares of land located in Tua' Abang Village, Semitau District on 19 December 2014. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, | |
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| | | <p>measurement report, payment receipt, location map submitted, relevant ID.</p> <ul style="list-style-type: none"> • Minutes of handover of land belonging to Kudim for 3.02 hectares of land located in Tua' Abang Village, Semitau District on 3 August 2017. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID. • Minutes of handover of land belonging to Florensus Lilik for 3.78 hectares of land located in Sekedau Village, Semitau District on 11 November 2019. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID. <p>The land compensation process (<i>Simpak Beliung</i>) is carried out on the basis of a collective agreement from village residents, community leaders and traditional leaders after an 80:20 agreement with the company. This means that 20% of the land area handed over by residents will be developed into plasma plantations for the people who own the land.</p> <p>Unit of certification was able show a questionnaire, signed by each landowner and the company representative. The question asked such as:</p> <ul style="list-style-type: none"> • Are there any plans for you to develop the land that will be handed over to meet food needs? | |
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| | | <ul style="list-style-type: none"> Do you have enough land to meet your food needs? Is your land needed for hunting areas, building houses, religious/customary rituals, etc. Do you feel forced or is someone forcing you to hand over the land? <p>Landowners have the freedom to give or not give consent to compensation for their land for development purposes or conservation purposes.</p> | |
| | 4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken; | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>Based on review to land compensation document, verified that hamlet head, traditional leaders, village head are involved in compensation process. This proves that the unit of certification has respected communities to give or withhold their consent to the plantation operations.</p> <p>The land compensation process (<i>Simpak Beliang</i>) is carried out on the basis of a collective agreement from village residents, community leaders and traditional leaders after an 80:20 agreement with the company. This means that 20% of the land area handed over by residents will be developed into plasma plantations for the people who own the land.</p> | |

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| | <p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>Unit of certification was able to show a questionnaire, signed by each landowner and the company representative. The question asked such as:</p> <ul style="list-style-type: none"> • Are there any plans for you to develop the land that will be handed over to meet food needs? • Do you have enough land to meet your food needs? • Is your land needed for hunting areas, building houses, religious/customary rituals, etc. • Do you feel forced or is someone forcing you to hand over the land? <p>Landowners have the freedom to give or not give consent to compensation for their land for development purposes or conservation purposes.</p> | |
| 4.4.3 | <p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>PT Paramitra Internusa Pratama obtained the HGU and can demonstrate map of legal ownership of the land through HGU maps:</p> | Complied |

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| | | <ul style="list-style-type: none"> Land Title (HGU): "Keputusan Menteri Agraria dan Tata Ruang/BPN Nomor: 35/HGU/KEM-ATR/BPN/2015", dated 7 May 2015 regarding Land Title of PT Paramitra Internusa Pratama. There are eight (8) parcels of land title with total area is 13,173.93 Ha. Land title certificate as below: <ol style="list-style-type: none"> Land certificate No. 00039, issued 26 June 2015, validity 7 May 2050. Hectarage: 362.26 Ha (Tengkawang Estate) Land certificate No. 00040, issued 26 June 2015, validity 7 May 2050. Hectarage: 222.46 Ha (Tengkawang Estate) Land certificate No. 00041, issued 26 June 2015, validity 7 May 2050. Hectarage: 3,192.09 Ha (Tengkawang Estate and Belian Estate) Land certificate No. 00042, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,289.74 Ha (Tengkawang Estate and Belian Estate) Land certificate No. 00043, issued 26 June 2015, validity 7 May 2050. Hectarage: 2.54 Ha (Tengkawang Estate) Land certificate No. 00044, issued 26 June 2015, validity 7 May 2050. Hectarage: 1.50 Ha (Tengkawang Estate) Land certificate No. 00045, issued 26 June 2015, validity 7 May 2050. Hectarage: 4,995.26 Ha (Tengkawang Estate and Belian Estate) Land certificate No. 00046, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,108.08 Ha (Tengkawang Estate) <p>Building Rights (HGB) for Belian POM, covering area 15.14 Ha refer to legal documents as below:</p> <ol style="list-style-type: none"> Certificate HGB No. 00002, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 24,406 m² (2.44 Ha), land use for POME pond. | |
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| | | <p>2. Certificate HGB No. 00003, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 66,189 m² (6.62 Ha), land use for Mill.</p> <p>3. Certificate HGB No. 00004, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 60,845 m² (6.08 Ha), land use for Reservoir.</p> <p>Total area under HGU/HGB of this certification is 13,189.07 Ha.</p> | |
| 4.4.4 | <p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>All relevant information is available in Bahasa Indonesia, such as minutes of handover, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, and location map.</p> <p>FPIC process is implemented by unit of certification prior developed the plantations.</p> | Complied |
| 4.4.5 | <p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> | Complied |

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| 4.4.6 | <p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>The land compensation process (Simpak Beliung) is carried out on the basis of a collective agreement from village residents, community leaders and traditional leaders after an 80:20 agreement with the company. This means that 20% of the land area handed over by residents will be developed into plasma plantations for the people who own the land. Available minutes of the meeting between management and community representatives from Nanga Seberuang Village, Temenggung Semitau, Patih Nanga Seberuang, Patih Lemedak, Patih Tua' Abang, Patih Sekedau on 28 April 2022, discussed regarding CSR program for the communities.</p> | Complied |
| <p>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.</p> | | | |
| 4.5.1 | <p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>PT Paramitra Internusa Pratama obtained the HGU and can demonstrate map of legal ownership of the land through HGU maps:</p> <p>Land Title (HGU): "Keputusan Menteri Agraria dan Tata Ruang/BPN Nomor: 35/HGU/KEM-ATR/BPN/2015", dated 7 May 2015 regarding</p> | Complied |

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| | | <p>Land Title of PT Paramitra Internusa Pratama. There are eight (8) parcels of land title with total area is 13,173.93 Ha. Land title certificate as below:</p> <ol style="list-style-type: none"> 1. Land certificate No. 00039, issued 26 June 2015, validity 7 May 2050. Hectarage: 362.26 Ha (Tengkawang Estate) 2. Land certificate No. 00040, issued 26 June 2015, validity 7 May 2050. Hectarage: 222.46 Ha (Tengkawang Estate) 3. Land certificate No. 00041, issued 26 June 2015, validity 7 May 2050. Hectarage: 3,192.09 Ha (Tengkawang Estate and Belian Estate) 4. Land certificate No. 00042, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,289.74 Ha (Tengkawang Estate and Belian Estate) 5. Land certificate No. 00043, issued 26 June 2015, validity 7 May 2050. Hectarage: 2.54 Ha (Tengkawang Estate) 6. Land certificate No. 00044, issued 26 June 2015, validity 7 May 2050. Hectarage: 1.50 Ha (Tengkawang Estate) 7. Land certificate No. 00045, issued 26 June 2015, validity 7 May 2050. Hectarage: 4,995.26 Ha (Tengkawang Estate and Belian Estate) 8. Land certificate No. 00046, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,108.08 Ha (Tengkawang Estate) <p>Building Rights (HGB) for Belian POM, covering area 15.14 Ha refer to legal documents as below:</p> <ol style="list-style-type: none"> 1. Certificate HGB No. 00002, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 24,406 m² (2.44 Ha), land use for POME pond. | |
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| | | <p>2. Certificate HGB No. 00003, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 66,189 m² (6.62 Ha), land use for Mill.</p> <p>3. Certificate HGB No. 00004, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 60,845 m² (6.08 Ha), land use for Reservoir.</p> <p>Available pre-inventory report, measurement report, and location map as evidence that assessment was conducted to identify the legal, customary and user rights prior to land compensation process.</p> | |
| 4.5.2 | <p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>FPIC process is implemented by unit of certification prior developed the plantations.</p> | Complied |
| 4.5.3 | <p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are</p> | Complied |

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| | | <p>several landowners whose never release their land parcel and company respect the decision.</p> <p>FPIC process is implemented by unit of certification prior developed the plantations.</p> <p>Unit of certification was able show a questionnaire, signed by each landowner and the company representative. The question asked such as:</p> <ul style="list-style-type: none"> • Are there any plans for you to develop the land that will be handed over to meet food needs? • Do you have enough land to meet your food needs? • Is your land needed for hunting areas, building houses, religious/customary rituals, etc. • Do you feel forced or is someone forcing you to hand over the land? • Landowners have the freedom to give or not give consent to compensation for their land for development purposes or conservation purposes. <p>Verified that landowners have given awareness that they have the right to say 'agree' or 'not agree' to operations planned on their lands.</p> | |
| 4.5.4 | <p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>The company use questionnaire to ensure local food and water security for the communities. Unit of certification was able show a questionnaire, signed by each landowner and the company representative. The question asked such as:</p> | Complied |

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| | | <ul style="list-style-type: none"> • Are there any plans for you to develop the land that will be handed over to meet food needs? • Do you have enough land to meet your food needs? • Is your land needed for hunting areas, building houses, religious/customary rituals, etc. • Do you feel forced or is someone forcing you to hand over the land? • Landowners have the freedom to give or not give consent to compensation for their land for development purposes or conservation purposes. <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p> | |
| 4.5.5 | <p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Communication and consent record are available in land compensation record, such as minutes of handover, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, and location map. Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> | Complied |

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| | | SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations. | |
| 4.5.6 | <p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p> | Complied |
| 4.5.7 | <p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p> | <p>Unit of certification is existing since 2015. There is no expansion area for plantations until this assessment conducted. However, some area within plantation is still not develop where that area owned by local communities. Unit of certification does not force to the landowner to release their land. This area is categorized as preserved land.</p> <p>Interview with sampled previous landowner informed that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p> | Complied |

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| 4.5.8 | <p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p> | <p>There is no new lands or expansion area within unit of certification. Some area with status reserves area (categorised as inherited land) are isolated from palm crops and not develop by the certificate holder. Communities are lived outside the plantations managed area boundary.</p> | Complied |
| <p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p> | | | |
| 4.6.1 | <p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p> | <p>PT Paramitra Internusa Pratama is subsidiary of RSPO member Golden Agri Resources (GAR). All procedures are developed by group and applicable to its subsidiaries. Procedure for identifying legal, customary or user rights, identifying entitled to compensation, calculating and distributing fair and gender-equal compensation are covers within "SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&L002, R.1, dated 1 Jul 2010)".</p> <p>Procedure for identifying land as follow:</p> <ol style="list-style-type: none"> 1. Identifying legal: determined by government in form of permit (location permit). 2. Identifying customary or user right: conducted during pre-inventory land (company, village and district team). 3. Land inventory physically verification: conducted by land ownership, local government (village and district), boundary indicator, neighbour landowner and company. <p>The procedure is in place and due to the unit of certification have no expansion area and or land compensation.</p> <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward. Based on document review and interview with previous landowner, land compensation process has followed the "SOP Ganti Rugi Tanah/Lahan" (SOP/NP/SMART/VII/D&L002).</p> | Complied |

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| 4.6.2 | <p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p> | <p>Within “<i>SOP Ganti Rugi Tanah/Lahan</i> (SOP/NP/SMART/VII/D&L002, R.1, dated 1 Jul 2010)”, procedure for calculating and distributing fair compensation conducted in participatory way, as follow:</p> <ol style="list-style-type: none"> 1. After Location Permit obtained from relevant authority, the Team (representative of company, villages and sub-district) conduct dissemination to communities. 2. The Team (representative of company, villages and sub-district) conducting pre-inventory against the land. 3. Field verification of land is carried out by landowners, local government, boundary markers, adjacent landowner, sub-district officials and the company team. 4. Participatory mapping of ground verification shall be signed by the company and local government official. 5. Consultation and coordination to determine price agreements with the village team, sub-district team, regency team (if needed) and company team. 6. After the price fixing is agreed upon, socialization is carried out to the community with the village team, sub-district team and company. 7. The land compensation process is carried out according to the agreed price. If it has not been agreed, then negotiations are carried out until there is an agreement. However, if the landowner does not agree to the price negotiation, then the area will be enclave/isolated and not managed by the company. 8. Application for compensation with complete requirements, submitted to the company. Then verified by the company team. 9. If the verification of the request for compensation is complete and agreed upon by the company team, the payment of compensation | Complied |
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| | | <p>shall be carried out openly and witnessed by the relevant parties. The entire process is documented and stored.</p> <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> | |
| 4.6.3 | <p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p> <p>- Minor compliance -</p> | <p>Unit of certification start the cultivation process since 2008. The land acquisition/compensation has been held before that time. Based on interview with customary leader and village leader obtain information that all level of community including women involved during land acquisition process.</p> <p>The land compensation process (local name: Simpak Beliung) is carried out based on a collective agreement from village residents, community leaders and traditional leaders after an 80:20 agreement with the company. This means that 20% of the land area handed over by residents will be developed into plasma plantations for the people who own the land.</p> | Complied |
| 4.6.4 | <p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p> <p>- Minor compliance -</p> | <p>Unit of certification is existing plantations since 2008 where land acquisition process starting from 2006 – 2020.</p> <p>Sample of land acquisition process can be seen below:</p> <ul style="list-style-type: none"> Minutes of handover of land on behalf of Riki Darmawan Surya for 1.77 hectares of land located in Tua' Abang Village, Semitau District on 19 December 2014. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID. | Complied |

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| | | <ul style="list-style-type: none"> • Minutes of Kudim's handover of 3.02 hectares of land located in Tua' Abang Village, Semitau District on 3 August 2017. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID. • Minutes of the handover of Paulus Sarman's 1.14 Ha land located in Tua' Abang Village, Semitau District on 9 August 2019. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID. • Minutes of the handover of Agus Awi's land area of 13.54 hectares located in Tua' Abang Village, Semitau District on December 19, 2014. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID. • Minutes of Yanti's handover of 2.26 hectares of land located in Tua' Abang Village, Semitau District on June 20, 2015. The document was signed by the hamlet head, traditional leaders, village head and Semitau subdistrict head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, | |
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| | | <p>pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</p> <ul style="list-style-type: none"> • Minutes of the handover of Rangga Warsito's 5.18 Ha land located in Nanga Lemedak Village, Semitau District on June 28, 2016. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID. • Minutes of the handover of Yohanes Ramai's 5.67 Ha land located in Nanga Lemedak Village, Semitau District on April 18, 2015. The document was signed by the hamlet head, traditional leaders, village head and Semitau subdistrict head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID. • Minutes of handover of land on behalf of Kristian Cangan for 5.52 hectares of land located in Nanga Seberuang Village, Semitau District on February 8, 2020. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID. | |
| <p>Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p> | | | |

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| 4.7.1 | <p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p> | <p>PT Paramitra Internusa Pratama has had the land acquisition proseddur through the document "<i>SOP Ganti Rugi Tanah/Lahan</i> (SOP/NP/SMART/VII/D&L002, R.1, dated 1 July 2010)", procedure for calculating and distributing fair compensation conducted in participatory way, as follow:</p> <ol style="list-style-type: none"> 1. After Location Permit obtained from relevant authority, the Team (representative of company, villages and sub-district) conduct dissemination to communities. 2. The team (representative of company, villages and sub-district) conducting pre-inventory against the land. 3. Field verification of land is carried out by landowners, local government, boundary markers, adjacent landowner, sub-district officials and the company team. 4. Participatory mapping of ground verification shall be signed by the company and local government official. 5. Consultation and coordination to determine price agreements with the village team, sub-district team, regency team (if needed) and company team. 6. After the price fixing is agreed upon, socialization is carried out to the community with the village team, sub-district team and company. 7. The land compensation process is carried out according to the agreed price. If it has not been agreed, then negotiations are carried out until there is an agreement. However, if the landowner does not agree to the price negotiation, then the area will be enclave/isolated and not managed by the company. 8. Application for compensation with complete requirements, submitted to the company. Then verified by the company team. | Complied |
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| | | <p>9. If the verification of the request for compensation is complete and agreed upon by the company team, the payment of compensation shall be carried out openly and witnessed by the relevant parties. The entire process is documented and stored.</p> <p>Procedure for identifying land as follow:</p> <ol style="list-style-type: none"> 1. Identifying legal: determined by government in form of permit (location permit). 2. Identifying customary or user right: conducted during pre-inventory land (company, village and district team). 3. Land inventory physically verification: conducted by land ownership, local government (village and district), boundary indicator, neighbour landowner and company. <p>The last compensation was done in 2019. There is no new expansion area and or land compensation after that.</p> | |
| 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>- Critical (Major) compliance -</p> | <p>In accordance to "SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&L002, R.1, dated 1 July 2010)"</p> <ol style="list-style-type: none"> 1. <i>After the price fixing is agreed upon, socialization is carried out to the community with the village team, sub-district team and company.</i> 2. <i>The land compensation process is carried out according to the agreed price. If it has not been agreed, then negotiations are carried out until there is an agreement. However, if the landowner does not agree to the price negotiation, then the area will be enclave/isolated and not managed by the company.</i> 3. <i>Application for compensation with complete requirements, submitted to the company. Then verified by the company team.</i> 4. <i>If the verification of the request for compensation is complete and agreed upon by the company team, the payment of compensation</i> | Complied |

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| | | <p><i>shall be carried out openly and witnessed by the relevant parties. The entire process is documented and stored.</i></p> <p>Based on interview with previous landowner, village representatives and customary leader obtained information that the land acquisition based on collective agreement from whole villagers with agreed price.</p> | |
| 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>- Minor compliance -</p> | <p>Based on interview with previous landowner, village representatives and customary leader obtained information that the land compensation process (Simpak Beliang) was carried out based on the collective agreement with an 80:20 agreement with the company. This means that 20% of the land area handed over by the residents will be developed into a plasma plantation for the community that owns the land.</p> <p>At present, the community has become the owner of the plasma land which is managed under a full managed by the company scheme whereby the development of the plantation is in accordance with the farmer's credit agreement with the bank. The distribution of sharing profit is carried out every month directly to the farmers who own the land after deducting credit, operational costs (maintenance and harvest) and management fees.</p> <p>The communities feel the positive impact of the company's business/operational activities. This is due to better access to transportation, access to employment and business opportunities, access to better education, health and community empowerment.</p> | Complied |
| Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights. | | | |
| 4.8.1 | <p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p> | <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company</p> | Complied |

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| | | <p>respect the decision. SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p> <p>Based on stakeholder interview and document review, there are no disputes regarding land or legal in the area of PT Paramitra Internusa Pratama.</p> | |
| 4.8.2 | <p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p> | <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation. Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision. SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p> <p>Based on stakeholder interview and document review, there is no land conflict in the area of PT Paramitra Internusa Pratama.</p> | Complied |
| 4.8.3 | <p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p> <p>- Minor compliance -</p> | <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation. Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p> | Complied |
| 4.8.4 | <p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p> | <p>Interview with sampled previous landowner informed that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation. Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are</p> | Complied |

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| | | <p>several landowners whose never release their land parcel and company respect the decision.</p> <p>SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p> <p>Based on stakeholder interview and document review, there are no conflict or disputes regarding land in the area of PT Paramitra Internusa Pratama.</p> | |
| Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships. | | | |
| Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses. | | | |
| 5.1.1 | Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance - | <p>The Fresh Fruit Bunch (FFB) price mechanism in West Kalimantan Province is based on the Provincial Decree "<i>Peraturan Gubernur Kalimantan Barat No. 86 Tahun 2022 tentang Petunjuk Pelaksanaan Penetapan Indeks K dan Harga Pembelian Tandan Buah Segar Kelapa Sawit Produksi Pekebun Kalimantan Barat</i>" – a Governor's regulation on the determination of the FFB purchase price, which was officially enacted on 10 November 2022.</p> <p>Based on that information and interview with the representative of scheme smallholder, who is the management of KOPSA Mitra Puyang Gana, FFB prices that used by the company is based on FFB price determined by the government, Plantation Agency of West Kalimantan Province. The smallholders noted that FFB price are informed by the company to smallholders. Additionally, FFB price can also accessed by the smallholders through the Plantation Agency staff directly every week.</p> <p>Record of FFB price for period January – September 2024 is in place and can be accessed by the smallholders. For example: "<i>Berita Acara Rapat Penetapan Indeks K dan Harga TBS Kelapa Sawit Produksi Pekebun</i>"</p> | Complied |

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| | | <p><i>Kalimantan Barat Periode III Bulan September 2024” – FFB Price for Period 16-22 September 2024:</i></p> <table><tr><th>Oil Palm Age (years)</th><th>FFB Price/kg (IDR)</th></tr><tr><td>3</td><td>2,196.22</td></tr><tr><td>4</td><td>2,348.27</td></tr><tr><td>5</td><td>2,509.21</td></tr><tr><td>6</td><td>2,587.97</td></tr><tr><td>7</td><td>2,681.98</td></tr><tr><td>8</td><td>2,766.35</td></tr><tr><td>9</td><td>2,812.80</td></tr><tr><td>10-20</td><td>2,938.94</td></tr><tr><td>21</td><td>2,887.35</td></tr><tr><td>22</td><td>2,874.16</td></tr><tr><td>23</td><td>2,805.17</td></tr><tr><td>24</td><td>2,710.46</td></tr><tr><td>25</td><td>2,621.60</td></tr></table> <p>Below is the record of FFB price/kg in 2024 for oil palm age 10-20 years:</p> <table><tr><th rowspan="2">Month</th><th colspan="4">FFB Price/kg (IDR)</th></tr><tr><th>1st period</th><th>2nd period</th><th>3rd period</th><th>4th period</th></tr><tr><td>January</td><td>2,370.62</td><td>2,311.98</td><td>2,377.49</td><td>2,474.05</td></tr></table> | Oil Palm Age (years) | FFB Price/kg (IDR) | 3 | 2,196.22 | 4 | 2,348.27 | 5 | 2,509.21 | 6 | 2,587.97 | 7 | 2,681.98 | 8 | 2,766.35 | 9 | 2,812.80 | 10-20 | 2,938.94 | 21 | 2,887.35 | 22 | 2,874.16 | 23 | 2,805.17 | 24 | 2,710.46 | 25 | 2,621.60 | Month | FFB Price/kg (IDR) | | | | 1 st period | 2 nd period | 3 rd period | 4 th period | January | 2,370.62 | 2,311.98 | 2,377.49 | 2,474.05 | |
|----------------------|------------------------|--|------------------------|------------------------|---|----------|---|----------|---|----------|---|----------|---|----------|---|----------|---|----------|-------|----------|----|----------|----|----------|----|----------|----|----------|----|----------|-------|--------------------|--|--|--|------------------------|------------------------|------------------------|------------------------|---------|----------|----------|----------|----------|--|
| Oil Palm Age (years) | FFB Price/kg (IDR) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 2,196.22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 2,348.27 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 2,509.21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | 2,587.97 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 2,681.98 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | 2,766.35 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | 2,812.80 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10-20 | 2,938.94 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 21 | 2,887.35 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 22 | 2,874.16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 23 | 2,805.17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 24 | 2,710.46 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 25 | 2,621.60 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | FFB Price/kg (IDR) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 1 st period | 2 nd period | 3 rd period | 4 th period | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| January | 2,370.62 | 2,311.98 | 2,377.49 | 2,474.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|----------|---|--|----------|----------|----------|----------|----------|-------|----------|----------|----------|----------|-------|----------|----------|----------|----------|-----|----------|----------|----------|----------|------|----------|----------|----------|----------|------|----------|----------|----------|----------|--------|----------|----------|----------|----------|--|--|
| | | <table><tr><td>February</td><td>2,516.81</td><td>2,448.23</td><td>2,452.36</td><td>2,531.07</td></tr><tr><td>March</td><td>2,555.83</td><td>2,619.13</td><td>2,693.12</td><td>2,741.78</td></tr><tr><td>April</td><td>2,779.00</td><td>2,831.11</td><td>2,775.10</td><td>2,734.87</td></tr><tr><td>May</td><td>2,622.60</td><td>2,632.27</td><td>2,625.99</td><td>2,616.64</td></tr><tr><td>June</td><td>2,661.65</td><td>2,725.78</td><td>2,731.44</td><td>2,750.14</td></tr><tr><td>July</td><td>2,746.92</td><td>2,835.53</td><td>2,794.93</td><td>2,785.02</td></tr><tr><td>August</td><td>2,836.44</td><td>2,911.83</td><td>2,854.54</td><td>2,825.59</td></tr></table> | February | 2,516.81 | 2,448.23 | 2,452.36 | 2,531.07 | March | 2,555.83 | 2,619.13 | 2,693.12 | 2,741.78 | April | 2,779.00 | 2,831.11 | 2,775.10 | 2,734.87 | May | 2,622.60 | 2,632.27 | 2,625.99 | 2,616.64 | June | 2,661.65 | 2,725.78 | 2,731.44 | 2,750.14 | July | 2,746.92 | 2,835.53 | 2,794.93 | 2,785.02 | August | 2,836.44 | 2,911.83 | 2,854.54 | 2,825.59 | | |
| February | 2,516.81 | 2,448.23 | 2,452.36 | 2,531.07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| March | 2,555.83 | 2,619.13 | 2,693.12 | 2,741.78 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April | 2,779.00 | 2,831.11 | 2,775.10 | 2,734.87 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May | 2,622.60 | 2,632.27 | 2,625.99 | 2,616.64 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| June | 2,661.65 | 2,725.78 | 2,731.44 | 2,750.14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| July | 2,746.92 | 2,835.53 | 2,794.93 | 2,785.02 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| August | 2,836.44 | 2,911.83 | 2,854.54 | 2,825.59 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.1.2 | <p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <p>- Critical (Major) compliance -</p> | <p>The FFB prices issued by the Provincial Government through the Plantation Agency based of price fluctuation. For examples in September 2024; 1st period is on 1 – 7 September; 2nd period is on 8 – 15 September; 3rd period is on 16 – 22 September.</p> <p>Based on interview with the management of KOPSA Mitra Puyang Gana, noted that the FFB prices informed by management of PT PIP to KOPSA Mitra Puyang Gana. Additionally, FFB price can also accessed by the smallholders through the plantation agency staff directly every week.</p> | | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.1.3 | <p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p> | <p>FFB Price Mechanism in Kalimantan Barat refer to Provincial Decree "Peraturan Gubernur Kalimantan Barat No. 86 Tahun 2022 tentang Petunjuk Pelaksanaan Penetapan Indeks K dan Harga Pembelian Tandan Buah Segar Kelapa Sawit Produksi Pekebun Kalimantan Barat" – Governor regulation on determining FFB purchase price (stipulated on 10 November 2022).</p> <p>Based on that information above and interview with the management of KOPSA Mitra Puyang Gana, noted that the Koperasi and its member agreed with the pricing including deduction. Record of FFB price during January – September 2024 is in place and can be accessed by the smallholders.</p> | | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| 5.1.4 | <p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p> | <p>FFB Price Mechanism in Kalimantan Barat refer to Provincial Decree "Peraturan Gubernur Kalimantan Barat No. 86 Tahun 2022 tentang Petunjuk Pelaksanaan Penetapan Indeks K dan Harga Pembelian Tandan Buah Segar Kelapa Sawit Produksi Pekebun Kalimantan Barat" – Governor regulation on determining FFB purchase price (stipulated on 10 November 2022).</p> <p>Agreement between the company and the smallholder are described in MoU, <i>Perjanjian Kerjasama Pembangunan dan Pengelolaan Kebun Kemitraan No.01/PK/KOPSA-MPG/PT.PIP/04-2010, antara Koperasi Perkebunan Kelapa Sawit Mitra Puyang Gana (KOPSA MPG) dengan PT Paramitra Internusa Pratama (PIP)</i>. The MoU was signed by both party on 10 April 2010. The Agreement was established in Bahasa Indonesia. Based on signed Statement Letter, it was verified that all parties agreed and understood the contractual agreements they enter into, as evidence in the signature of both parties. The Agreements are fair, legal and transparent containing FFB legality, requirement, price and payment method. Both parties kept the agreement document.</p> <p>Based on that information above and interview with the management of KOPSA Mitra Puyang Gana, noted that they are agreed and understood the contractual agreement. Prior to this agreement, deliberation has been made by all parties, including women, elderly, customary representatives, and local government.</p> <p>Additionally, there are other contractors such as heavy equipment rental, infrastructure, FFB transport, EFB transport and local groceries, such as CV Lintas Batas Sejahtera, UD Sumber Rejeki, Toko Sinar, Sugeng Ariyanto, Triyadi, and Tadeaus Kasu. Based on interview with contractor representatives, noted that all contractor understood the contractual agreements they enter into.</p> | Complied |
| 5.1.5 | <p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p> | <p>Agreement between the company and the smallholder are described in MoU, <i>Perjanjian Kerjasama Pembangunan dan Pengelolaan Kebun</i></p> | Complied |

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| | | <p><i>Kemitraan No.01/PK/KOPSA-MPG/PT.PIP/04-2010, antara Koperasi Perkebunan Kelapa Sawit Mitra Puyang Gana (KOPSA MPG) dengan PT Paramitra Internusa Pratama (PIP). The MoU was signed by both party on 10 April 2010. The Agreement was established in Bahasa Indonesia. Based on signed Statement Letter, it was verified that all parties understood the contractual agreements they enter into, as evidence in the signature of both parties. The Agreements are fair, legal and transparent containing FFB legality, requirement, price and payment method. Both parties kept the agreement document.</i></p> <p>Additionally, there are other contractors such as heavy equipment rental, infrastructure, FFB transport, EFB transport and local groceries. Sample of contract verified:</p> <ul style="list-style-type: none"> • <i>"Surat Perjanjian Kerja" No.022/BLNE/DIVI/SPKL/04/2024, dated 9 April 2024, for heavy equipment rental between PT Paramitra Internusa Pratama and CV Lintas Batas Sejahtera, for period 19 April 2024 to 30 June 2024.</i> • <i>"Surat Perjanjian Kerja" No.010/BLNE/DIV2/SPKL/01/2024-Angkut TBS, dated 1 January 2024, for FFB Transport between PT Paramitra Internusa Pratama and Sugeng Ariyanto (local contractor), for period 1 January 2024 to 30 June 2024.</i> • <i>"Surat Perjanjian Kerja" No.03/BLNE/SPKL/DIV03/2024-Angkut Janjang Kosong, dated 2 January 2024, for EFB Transport between PT Paramitra Internusa Pratama and Triyadi (local contractor), for period 2 January 2024 to 31 December 2024.</i> • <i>"Surat Perjanjian Kerja" No.018/BLNE/SPKL/03/2024-Angkut Laterit, dated 15 March 2024, for Transport of Laterit for road hardening between PT Paramitra Internusa Pratama and (local contractor), for period 15 March 2024 to 14 June 2024.</i> <p>Based on review to above documents, noted that contracts are fair, legal and transparent and have an agreed timeframe.</p> | |
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| 5.1.6 | <p>(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p> | <p>The unit of certification received FFB from Scheme Smallholder, which is Koperasi Perkebunan Kelapa Sawit Mitra Puyang Gana (KOPSA MPG), that covers area of five village, consist of Tua Abang, Sekedau, Sungai Putat, Seberuang and Lemedak Village. Oil palm plantation of KOPSA Mitra Puyang Gana is fully managed as Belian Plasma (BLNA), under control of Tengawang Estate Manager.</p> <p>Member of KOPSA Mitra Puyang Gana receive the money from the sale of TBS deducted by the costs of plantation development, operations, fertilizer and pesticides. Payment documents noted FFB weigh, price, deduction and amount of paid. Evident of payment verified are as follow:</p> <ul style="list-style-type: none"> • Evidence of FFB receiving period 1 – 31 August 2024 with amount 3,245,430 kg, that signed by Chairman of cooperative KOPSA Mitra Puyang Gana on 31 August 2024. • Invoice No. 001/INV/BLNA/08/24 dated 31 August 2024 for FFB payment period of August 2024. • Payment instruction from Estate Manager and Regional Controller on 9 September 2024 referring to Invoice No. 001/INV/BLNA/08/24 dated 9 September 2024 for FFB payment period of August 2024. • Transfers evidence from Bank Sinarmas to bank account of cooperative Kopsa Mitra Puyang Gana on 9 September 2024 refer to payment instruction above. • Distribution of payment to each smallholder: "<i>Daftar Dana Talangan Hasil Panen Kebun Kemitraan untuk CPCL Tahap I – Periode GR 2007 s/d Mei 2011</i>", period August 2024. <p>Based on document review and interview with management of KOPSA Mitra Puyang Gana, noted that receipts specifying price, weigh, deductions and amount paid are given, and payment are made in timely manner.</p> | Complied |
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| | | <p>Evidence of payment to CV Lintas Batas Sejahtera:</p> <ul style="list-style-type: none"> • "Berita Acara Pemeriksaan Pekerjaan" - Evidence of excavator rental period June 2024, with amount 240 HM, that signed by Belian Estate Manager and Chairman of CV Lintas Batas Sejahtera on 26 June 2024. • Invoice No. Libas/233/Juli 2024, dated 15 July 2024 for payment of excavator rental period June 2024. • Transfer instruction dated 15 July 2024 referring to Invoice No. Libas/233/Juli 2024 and SPK No.022/BLNE/DIVI/SPKL/04/2024. <p>Based on review to above documents, and interview to representative of contractor, noted that agreed payments are made in a timely manner and receipts specifying volume of work result, unit price, taxes, and amount paid are given.</p> | |
| 5.1.7 | <p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p> | <p>The weighbridge has been calibrated by Industrial Agency of Sintang Regency (<i>UPT Metrologi Legal</i>) annually based on evidence as follow:</p> <ul style="list-style-type: none"> • Certificate of Calibration No. 500.2.3.15/011/SKHP-MLSTG-KH/6/2024, dated 10 June 2024, for Avery Weight Tronik model ZM 510-SD4, Serial No. 214251894, valid until 5 June 2025. • Certificate of Calibration No. 500.2.3.15/012/SKHP-MLSTG-KH/6/2024, dated 10 June 2024, for Avery Weight Tronik model ZM 510, Serial No. 233650533, valid until 7 June 2025. | Complied |
| 5.1.8 | <p>The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p> <p>- Minor compliance -</p> | <p>The unit of certification provided several trainings for management and smallholders of KOPSA Mitra Puyang Gana (Belian Plasma). For example, training related to management of cooperative, financial, tax, good agriculture practices and prevention of land or forest fire.</p> <p>Up to this audit, Belian Plasma (BLNA) is still excluded from the scope of RSPO certification. Based on interview with top management at the</p> | Complied |

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| | | <p>unit, noted that certification for smallholders Belian Plasma is still in process for administration.</p> <p>Below is the sample record of training to smallholder:</p> <ul style="list-style-type: none"> • Training regarding tax, dated 10 September 2024, trainer KPP Sintang, attended by 12 participants. • Training regarding good agriculture practices and field visit, dated 17 July 2024, attended by 16 participants. • Training regarding Financial of Koperasi, dated 24 July 2024, attended by 13 participants. • Training regarding forest and land fire (<i>Masyarakat Siaga Api – Program Desa Makmur Peduli Api PT Paramitra Internusa Pratama, PT Persada Graha Mandiri and PT Kartika Prima Cipta</i>), dated 1 August 2024, attended by 101 participants. | |
| 5.1.9 | <p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p> | <p>If there are complaints or dissatisfaction from external parties, PT Paramitra Internusa Pratama refers to "SOP Penanganan Keluhan dan Ketidakpuasan No.SOP/SMART/GIMS-SCMD/USDV/I/001 rev.2" dated 1 July 2017.</p> <p>Based on interview with communities, so far, no complaint or grievance to PT Paramitra Internusa Pratama related to FFB sales.</p> | Complied |
| Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains. | | | |
| 5.2.1 | <p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama gathered the social issue from the local communities through the consultation and reflected on CSR plan period 2024. There are several programs of training and socialization for developing local communities period 2024.</p> <p>The company also provides training access to partnership farmers (Plasma), as follows:</p> | Complied |

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| | | <ol style="list-style-type: none"> 1. On September 10, 2024, training on taxation training was attended by 12 farmers located at the Sintang plasma KPP (Tax Service Office) 2. Training on July 17, 2024, training on Plasma Garden Practices and Field Visits and introduction P&C RSPO as well was attended by 16 Farmers located in Division III Plasma and the Puyang Gana Mitra Palm Oil Cooperative Office. 3. On July 24, 2024, training on cooperative financial reporting was attended by 13 farmers located at the Puyang Gana Mitra Palm Oil Cooperative Office. | |
| 5.2.2 | <p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama fully managed the smallholders block under single management namely Belian Plasma. The smallholders only managed the financial aspect where the company has responsibility to manage operational activity starting from land clearing, upkeep until harvesting. However, the company also provided best management practices training (specifically on pesticide handling) and financial management to the board of cooperative Koperasi Mitra Puyang Gana. Sighted the record of training on 3 August 2022 that attended by 17 participants.</p> | Complied |
| 5.2.3 | <p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p> | <p>All smallholders block under Belian Plasma who fully managed by the company has the land title from the government c.q National Land Department (<i>BPN: Badan Pertanahan Nasional</i>) since 2008. The certificate held by the farmers are proprietary certificates (SHM: Sertifikat Hak Milik).</p> <p>It means, all FFB comes from the smallholders are legal.</p> | Complied |
| 5.2.4 | <p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p> | <p>PT Paramitra Internusa Pratama implementing full managed in scheme smallholder, all operation activities are conducted by the company. However, the company provide training of GSEP (GAR Social and Environment Policy) to the surrounding communities including scheme smallholder, e.g. on 15 Feb 2022 located at Pancasila Building of</p> | Complied |

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| | | Semtau District, attended by 37 participants. Subject of pesticide handling are including in environment management. | |
| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance - | Available report of smallholder development progress of PT Paramitra Internusa Pratama period July to September 2022 No.029/PIP-PTK/DL7/X/2022 dated 7 Oct 2022, reported to Food and Agriculture Services of Kapuas Hulu Regency. Smallholder development progress reported mature area is 1,685.16 Ha and immature area is 112.97 Ha. | Complied |
| Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions. | | | |
| Criteria 6.1: Any form of discrimination is prohibited. | | | |
| 6.1.1 | (C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance - | PT Paramitra Internusa Pratama has established the policies on non-discrimination and equal opportunity as per document " <i>Kebijakan Hubungan Industrial – Perlindungan Pekerja /Buruh dari Diskriminasi</i> " (KHI-SMART/011-00), means Industrial Relations Policy – Protection of Workers/Labour from Discrimination". The policy explained that the company is implementing harmonious industrial relations, dynamic and fair. The company's policy is also published using posters at strategic locations in the plantations (Belian Estate, Tengawang Estate and Belian Mill). - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 24 – 28 June 2024 at Tengawang Estate attended by 267 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 17 May, 9 September, 30 July and 26 July 2024 at Belian Estate attended by 75 participants. | Complied |

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| | | <p>Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 29 February 2024 at Belian Mill attended by 27 participants</p> <p>Available employee list updated August 2024 demonstrated that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin or gender:</p> <p>For example, below is employee list for each Estate & Mill:</p> <p style="text-align: center;"><u>Belian Estate:</u></p> <table><tr><th>Ethnic</th><th>Number</th><th>Percent (%)</th></tr><tr><td>Dayak</td><td>124</td><td>31%</td></tr><tr><td>Jawa</td><td>175</td><td>44%</td></tr><tr><td>Melayu Deli</td><td>26</td><td>7%</td></tr><tr><td>Banten</td><td>17</td><td>4%</td></tr><tr><td>Timor</td><td>2</td><td>1%</td></tr><tr><td>Sunda</td><td>12</td><td>3%</td></tr><tr><td>Aceh</td><td>1</td><td>0%</td></tr><tr><td>Banjar</td><td>2</td><td>1%</td></tr><tr><td>Flores</td><td>15</td><td>4%</td></tr><tr><td>Toraja</td><td>2</td><td>1%</td></tr><tr><td>Bugis</td><td>7</td><td>2%</td></tr><tr><td>Lampung</td><td>4</td><td>1%</td></tr><tr><td>Sambas</td><td>1</td><td>0.25%</td></tr><tr><td>Minahasa</td><td>1</td><td>0.25%</td></tr><tr><td>Lombok</td><td>4</td><td>1%</td></tr></table> | Ethnic | Number | Percent (%) | Dayak | 124 | 31% | Jawa | 175 | 44% | Melayu Deli | 26 | 7% | Banten | 17 | 4% | Timor | 2 | 1% | Sunda | 12 | 3% | Aceh | 1 | 0% | Banjar | 2 | 1% | Flores | 15 | 4% | Toraja | 2 | 1% | Bugis | 7 | 2% | Lampung | 4 | 1% | Sambas | 1 | 0.25% | Minahasa | 1 | 0.25% | Lombok | 4 | 1% | |
|-------------|--------|--|--------|--------|-------------|-------|-----|-----|------|-----|-----|-------------|----|----|--------|----|----|-------|---|----|-------|----|----|------|---|----|--------|---|----|--------|----|----|--------|---|----|-------|---|----|---------|---|----|--------|---|-------|----------|---|-------|--------|---|----|--|
| Ethnic | Number | Percent (%) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dayak | 124 | 31% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jawa | 175 | 44% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Melayu Deli | 26 | 7% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Banten | 17 | 4% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Timor | 2 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sunda | 12 | 3% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aceh | 1 | 0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Banjar | 2 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Flores | 15 | 4% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Toraja | 2 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bugis | 7 | 2% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lampung | 4 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sambas | 1 | 0.25% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Minahasa | 1 | 0.25% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lombok | 4 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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Revision 15 (Nov 2023)

| | | | <table><tr><td>Banten</td><td>36</td><td>5%</td></tr><tr><td>Bugis</td><td>2</td><td>0%</td></tr><tr><td>Sumbawa</td><td>1</td><td>0%</td></tr><tr><td>Lombok</td><td>1</td><td>0%</td></tr><tr><td>Batak</td><td>2</td><td>0%</td></tr><tr><td>Papua</td><td>1</td><td>0%</td></tr><tr><td>Lampung</td><td>4</td><td>1%</td></tr><tr><td>Sumbawa</td><td>5</td><td>1%</td></tr><tr><td>Total</td><td>660</td><td>100%</td></tr></table> | Banten | 36 | 5% | Bugis | 2 | 0% | Sumbawa | 1 | 0% | Lombok | 1 | 0% | Batak | 2 | 0% | Papua | 1 | 0% | Lampung | 4 | 1% | Sumbawa | 5 | 1% | Total | 660 | 100% | |
|--------------|------------|-------------|---|----------|--------|------------|-------|-----------|-----|--------------|------------|--------------|------------|---|----|-------|---|----|-------|---|----|---------|---|----|---------|---|----|--------------|------------|-------------|--|
| Banten | 36 | 5% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bugis | 2 | 0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sumbawa | 1 | 0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lombok | 1 | 0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Batak | 2 | 0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Papua | 1 | 0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lampung | 4 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sumbawa | 5 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 660 | 100% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | <table><tr><th>Gender</th><th>Number</th></tr><tr><td>Man</td><td>379</td></tr><tr><td>Women</td><td>281</td></tr><tr><td>Total</td><td>660</td></tr></table> | Gender | Number | Man | 379 | Women | 281 | Total | 660 | | | | | | | | | | | | | | | | | | | | |
| Gender | Number | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Man | 379 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Women | 281 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 660 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | <table><tr><th>Religion</th><th>Number</th></tr><tr><td>Musleem</td><td>352</td></tr><tr><td>Christian</td><td>50</td></tr><tr><td>Chatholic</td><td>258</td></tr><tr><td>Total</td><td>660</td></tr></table> | Religion | Number | Musleem | 352 | Christian | 50 | Chatholic | 258 | Total | 660 | | | | | | | | | | | | | | | | | | |
| Religion | Number | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Musleem | 352 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Christian | 50 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Chatholic | 258 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 660 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | <p>Belian Mill:</p> <table><tr><th>Ethnic</th><th>Number</th><th>Percen (%)</th></tr></table> | Ethnic | Number | Percen (%) | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ethnic | Number | Percen (%) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | |
|--------------|------------|-------------|
| Dayak | 90 | 59% |
| Jawa | 19 | 13% |
| Melayu Deli | 37 | 24% |
| Flores | | 0% |
| Sunda | | 0% |
| Banten | | 0% |
| Bugis | | 0% |
| Sumbawa | | 0% |
| Lombok | 1 | 1% |
| Batak | 4 | 3% |
| Papua | | 0% |
| Padang | 1 | 1% |
| Sumbawa | | 0% |
| Total | 152 | 100% |

| Gender | Number |
|--------------|------------|
| Man | 147 |
| Women | 5 |
| Total | 152 |

| Religion | Number |
|-----------|--------|
| Musleem | 62 |
| Christian | 15 |
| Chatholic | 75 |

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| | | <table><tr><td>Total</td><td>152</td></tr></table> | Total | 152 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------------|---|---|--------|--------|------------|-------|-----|-----|------|-----|-----|-------------|----|----|--------|----|----|-------|---|----|-------|----|----|------|---|----|--------|---|----|--------|----|----|--------|---|----|-------|---|----|---------|---|----|--------|---|-------|----------|---|-------|----------|
| Total | 152 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Based on the study of a list of documents workers and distribution, that the company has given an equal chance to all the workers and did not distinguish of gender, religion, and tribes. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6.1.2 | <p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p> | <p>The employee’s demography in PT Paramitra Internusa Pratama proven the nondiscrimination as evidence that all workers came from different backgrounds (race, ethnic, origin, religion, gender). For example, the demography of Tengkwang Estate as below:</p> <p style="text-align: center;"><u>Belian Estate:</u></p> <table><tr><th>Ethnic</th><th>Number</th><th>Percen (%)</th></tr><tr><td>Dayak</td><td>124</td><td>31%</td></tr><tr><td>Jawa</td><td>175</td><td>44%</td></tr><tr><td>Melayu Deli</td><td>26</td><td>7%</td></tr><tr><td>Banten</td><td>17</td><td>4%</td></tr><tr><td>Timor</td><td>2</td><td>1%</td></tr><tr><td>Sunda</td><td>12</td><td>3%</td></tr><tr><td>Aceh</td><td>1</td><td>0%</td></tr><tr><td>Banjar</td><td>2</td><td>1%</td></tr><tr><td>Flores</td><td>15</td><td>4%</td></tr><tr><td>Toraja</td><td>2</td><td>1%</td></tr><tr><td>Bugis</td><td>7</td><td>2%</td></tr><tr><td>Lampung</td><td>4</td><td>1%</td></tr><tr><td>Sambas</td><td>1</td><td>0.25%</td></tr><tr><td>Minahasa</td><td>1</td><td>0.25%</td></tr></table> | Ethnic | Number | Percen (%) | Dayak | 124 | 31% | Jawa | 175 | 44% | Melayu Deli | 26 | 7% | Banten | 17 | 4% | Timor | 2 | 1% | Sunda | 12 | 3% | Aceh | 1 | 0% | Banjar | 2 | 1% | Flores | 15 | 4% | Toraja | 2 | 1% | Bugis | 7 | 2% | Lampung | 4 | 1% | Sambas | 1 | 0.25% | Minahasa | 1 | 0.25% | Complied |
| Ethnic | Number | Percen (%) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dayak | 124 | 31% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jawa | 175 | 44% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Melayu Deli | 26 | 7% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Banten | 17 | 4% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Timor | 2 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sunda | 12 | 3% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aceh | 1 | 0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Banjar | 2 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Flores | 15 | 4% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Toraja | 2 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bugis | 7 | 2% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lampung | 4 | 1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sambas | 1 | 0.25% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Minahasa | 1 | 0.25% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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RSPO P&C Public Summary Report
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| | | <table><tr><td>Christian</td><td>15</td></tr><tr><td>Chatholic</td><td>75</td></tr><tr><td>Total</td><td>152</td></tr></table> | Christian | 15 | Chatholic | 75 | Total | 152 | |
| Christian | 15 | | | | | | | | |
| Chatholic | 75 | | | | | | | | |
| Total | 152 | | | | | | | | |
| | | <p>Based on the study of a list of documents workers and distribution, that the company has given an equal chance to all the workers and did not distinguish pekrja top gender, religion, other daln tribes.</p> <p>At the time of the audit also verified against the promotion of opportunity to the workers, as follows:</p> <p>Example of promotion:</p> <ul style="list-style-type: none">○ Promotion from Group/Status PKH-SW (Daily Worker – Time Unit) to PT-4A for worker Riki Candra (NIK: 2181229) position of Field Worker in Plantation as Plant Upkeep in Division I as of January 25, 2024 based on Estate Manager Decree No. 002/SK-EST/I/2024 dated January 25, 2024 with a wage of IDR 2,746,010○ Promotion from Group/Status PKH-SW (Daily Worker – Time Unit) to PT-4A for worker Eleser (NIK: 2380671) position of Field Worker in Plantation as Plant Upkeep in Division I as of January 25, 2024 based on Estate Manager Decree No. 002/SK-EST/I/2024 dated January 25, 2024 Wages amounting to IDR 2,746,010 <p>Example of Recruitment prosess:</p> <p>On August 24, 2024 for oil palm harvesting work at Tengkawang Estate: Employee candidate Rizki Candra Al Rosyid with address at Dusun Pecuk Rt/Rw: 29/010, Ngabar Village, Jetis District, Mojokerto Regency, East Java Province</p> <p>Application for approval of PT-3 employees Rizki Candra Al Rosyid to RC Semitau (Mr. Elvin Junaidi Silaban) dated August 24, 2024.</p> | | | | | | | |

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)

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| | | <p>List of personnel administration equipment: application letter, photocopy of KTP and family card and health check results at Kebun Belian Clinic.</p> <p>Employment Acceptance Letter No. 145/SK-PT-3/TNKE/08/2024 dated August 24, 2024 in the name of employee candidate Rizki Candra Al Rosyid for harvesting workers in Division 02 Tengkawang Estate.</p> <p>On the process of recruitment workers, verify that there is no indication of voting after a fee to the workers. Equal treatment to prospective workers Good Women workers or male, religion as well as tribes/race.</p> | |
| 6.1.3 | <p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama has defined the procedure related to new employment recruitment.</p> <ul style="list-style-type: none"> - Recruitment: according to "<i>SOP Rekrutmen dan Seleksi Karyawan</i>" (AA-HR-305.2-R0) dated 1 February 2009 regarding employee recruitment and selection, the company recruits new employee based on their capabilities and qualifications. - Promotion: according to "<i>SOP Promosi dan Mutasi</i>" (KHI-SMART/010-00) dated 1 August 2017. The procedure regulated employee promotion related position and grade. - Retirement and termination: according to Collective Labour Agreement (KEP.4/HI.00.01/19.1905.210621001/B/X/2021) dated 29 October 2021. Article 39 described related to retirement and Article 40 related to termination. <p>Implementation records on employment procedures are available during this initial certification audit, such as:</p> <p>Example of Recruitment proses:</p> <p>On August 24, 2024 for oil palm harvesting work at Tengkawang Estate:</p> | Complied |

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| | | <p>Employee candidate Rizki Candra Al Rosyid with address at Dusun Pecuk Rt/Rw: 29/010, Ngabar Village, Jetis District, Mojokerto Regency, East Java Province</p> <p>Application for approval of PT-3 employees Rizki Candra Al Rosyid to RC Semitau (Mr. Elvin Junaidi Silaban) dated August 24, 2024.</p> <p>List of personnel administration equipment: application letter, photocopy of KTP and family card and health check results at Kebun Belian Clinic.</p> <p>Employment Acceptance Letter No. 145/SK-PT-3/TNKE/08/2024 dated August 24, 2024 in the name of employee candidate Rizki Candra Al Rosyid for harvesting workers in Division 02 Tengkawang Estate.</p> | |
| 6.1.4 | <p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p> | <p>Pregnancy test is only conducted to check whether female worker, especially spraying and manuring worker, pregnant or not. It is not conducted as discriminatory measure. Pregnant workers can still work in alternative type of work that does not contain chemical material or jobs that require heavy loads. In case of female worker's pregnancy test is positive, then she will be rotated to other types of work for temporary. During 2024 (January to August 2024) there is no spraying employees who was pregnant, then no work transfer implemented due to pregnancy. Meanwhile, the work of spreading fertilizer is carried out using a mechanical emdek.</p> <p>The last pregnancy check was conducted in August 2024 on 7 female spray workers in Tengakwang Estate with the result that none were identified as pregnant and breastfeeding babies.</p> <p>The last pregnancy check was conducted in August 2024 on 7 female spray workers in Belian Estate with the result that none were identified as pregnant and breastfeeding babies.</p> | Complied |

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| 6.1.5 | <p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p> | <p>PT Paramitra Internusa Pratama has formed a gender committee in each work unit, including the Plantation and Mill.</p> <p><u>Belian Mill:</u></p> <p>Appointment letter of the gender committee based on the Decree of the Factory Manager of BLNM dated February 28, 2024 concerning the appointment of the Chairperson of the BLNM Unit Gender Committee in the name of Resi Safitri.</p> <p>Organizational structure of the gender committee:</p> <p>Chairperson: Resi Safitri Deputy Chairperson: Defi Secretary: Neli Nopsabilah</p> <p>Work Program:</p> <ul style="list-style-type: none"> - Dry prayer; once a week - Yasinan - Integrated Health Service Post - Mutual cooperation - Women's sports <p><u>Tengkawang Estate:</u></p> <p>The letter of appointment of the gender committee based on the Decree of Estate Manager of TNKE dated January 22, 2024 concerning the appointment of the Chairperson of the TNKE Unit Gender Committee on behalf of Nurul Mahmudah.</p> <p>Organizational structure of the gender committee:</p> <p>Chairperson: Resi Safitri Deputy Chairperson: Fransiska Dina</p> | Complied |
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| | | <p>Secretary: Kiki Tamara Treasurer: Valentina Yuli Representatives: Pondok 1: Khatiminah and Ruslan Pondok 2: Mansur and Melania</p> <p><u>Belian Estate:</u> The letter of appointment of the gender committee based on the Decree of Estate Manager of BLNE dated January 7, 2024 concerning the appointment of the Chairperson of the BLNE Unit Gender Committee on behalf of Adek Chintya Putri. Organizational structure of the gender committee: Chairperson: Adek Chintya Putri Deputy Chairperson: Kristiana Venita Yeni Secretary: Puspita Gita Treasurer: Ria Ariska Yosi Representatives: Pondok 1: Liniyana Pondok 2: Eka Suharti</p> <p>Work Program and realization in 2024:</p> <ul style="list-style-type: none">- Socialization about the women's commission, will be implemented in December 2024- Monthly Posyandu activities; have been realized every month in collaboration with the Semitau Health Center- Socialization of women's reproductive health, has been implemented in February 2024 | |
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| | | <ul style="list-style-type: none"> - Socialization about sexual violence, has been realized in March 2024 - Training in making cakes/snacks for female workers of PT PIP, has been implemented in February 2024. This program would be an opportunity for improvement. <p>Based on an interview with the head of the gender committee, that until now there has been no violence and sexual harassment in the period of 2024, although in 2023 there was sexual harassment of a female worker (Clinical Nurse at TNKE) on behalf of He** Ka****. This incident has been followed up and reported to the Kapuas Hulu Regency Police. Meanwhile, the victim (female worker) has received her rights (severance pay, BPJS Tek insurance and separation money) and has been given to the worker's heirs in accordance with applicable regulations and laws (PP No. 35/2021).</p> | |
| 6.1.6 | <p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p> | <p>Wages at PT Primatama Internusa Pratama are in accordance with the minimum wage set by the Governor of West Kalimantan each year. Wages for the 2024 period are based on the Decree of the Governor of West Kalimantan No. 1869/NAKERTRAN/2023 dated November 29, 2023 concerning the Minimum Wage of Kapuas Hulu Regency in 2024 amounting to Rp2,746,009.44.</p> <p>Furthermore, PT PIP also determines the Wage Scale Structure, based on the Decree by the Director no. 020/PSM7/I/2024 dated January 16, 2024 concerning the Wages of Permanent Workers of PT Paramita Internusa Pratama in the Kapuas Hulu Regency Area in 2024. The smallest wage is IDR 2,746,500 (PT4) and the largest is IDR 3,105,009 (PT1).</p> <p>In wages with volume units, premium wages are determined for harvesting activities (Harvest Premium) and non-harvest, based on:</p> | Complied |

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| | | <ul style="list-style-type: none"> - Decree of PSM 7 (Perekebunan Sinar Mas 7) No. 002/PSM-7/VPA-KTPO/01/2024 dated January 4, 2024 concerning the Premium System for Harvesting Oil Palm Fresh Fruit Bunches and Collecting Loose Fruit in the Semitau Region. Taking into account the type of seedling, height of the productive tree and age of the plant, condition of the area and type and size of harvesting equipment. - Decree of PSM 7 (Perekebunan Sinar Mas 7) No. 004/PSM-7/VPA-7/06/2024 dated June 12, 2024 concerning the Non-Harvest Premium in the Semitau Region <p>Based on interviews with sample workers during field visits, information was obtained that the implementation of wages and premium systems was in accordance with workers' capabilities and applicable laws and regulations.</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). | | | |
| 6.2.1 | (C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand. - Critical (Major) compliance - | <p>The company has set its workers' wages based on the minimum wage of Kapuas Hulu Regency based on the Decree of the Governor of West Kalimantan No. 1869/NAKERTRAN/2023 dated November 29, 2023 concerning the Minimum Wage of Kapuas Hulu Regency in 2024 of IDR 2,746,009.44 per month.</p> <p>The company has also set a wage scale structure for the 2024 period based on the Decree by the Director no. 020/PSM7/I/2024 dated January 16, 2024 concerning the Wages of Permanent Workers of PT Paramita Internusa Pratama in the Kapuas Hulu Regency Area in 2024. The smallest wage is IDR 2,746,500 (PT4) and the largest is IDR 3,105,009 (PT1).</p> | Complied |
| 6.2.2 | (C) Employment contracts and related documents detailing payments and | PT PIP has set employment provisions in accordance with regulation and legal requirement. It stated in employment contract off temporary | Complied |

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| | <p>conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p> | <p>worker (PKWT) in Article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday). Salary was provided based on minimum wage regulation from Regent Decree of Kapuas Hulu 1869/NAKERTRAN/2023 regard "UMK Kapuas Hulu Tahun 2024", dated 29 Nov 2023, IDR 2,746,009.44 per month.</p> <p>Determination of salary (including regular and other benefit), working hours (including overtime) and working days have been regulated in the Collective Labor Agreement (PKB) period 2021 – 2023, Chapter VI, Article 18-19; regarding wages, which explains:</p> <ul style="list-style-type: none"> a) Permanent workers are given salary, determined by the employer that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and Rice allowance) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations. c) Permanent workers receive additional wages (UMP / UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Provisions of holidays and leave (including maternity leave and menstruation leave) have been regulated in Chapter IV, Article 11-12 regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>Verification has carried out of Pay Slip documents, such as:</p> | |
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| | | Pay Slip on June Period Belian Mill Employee : Abraham Kalvin Onang NIP : 1312202 Position : Water Treatment Basic Salary IDR 2,757,009 Overtime IDR 2,717,174 BPJS-Tek (allowance) IDR 189,958 BPJS-Kes (allowance) IDR 110,280 Sub total IDR 5,774,421 Deduction BPJS IDR 300,238 BPJS-Tek IDR 82,710 BPJS- Kes IDR 27,570 Loan IDR 916,667 Cooperative contribution IDR 30,000 Union labor contribution IDR 2,000 Sub total IDR 1,359,185 Net Salary IDR 4,415,236 | Pay Slip on July Period Tengkawang Estate Employee : Saringan NIP : 1428001 Position : Upkeep Basic Salary IDR 2,757,009 Overtime IDR 2,215,178 BPJS-Tek (allowance) IDR 189,958 BPJS-Kes (allowance) IDR 110,280 Sub total IDR 5,272,425 Deduction BPJS IDR 300,238 BPJS-Tek IDR 82,710 BPJS- Kes IDR 27,570 Loan IDR - Cooperative contribution IDR 10,000 Union labor contribution IDR 2,000 Sub total IDR 422,518 Net Salary IDR 4,849,907 | |
| | | Pay Slip on August Period Belian Mill Employee : Maruri NIP : 1800102 Position : Kreani Teknik Basic Salary IDR 2,757,009 Overtime IDR 3,387,686 BPJS-Tek (allowance) IDR 181,223 BPJS-Kes (allowance) IDR 110,840 Sub total IDR 6,436,758 Deduction BPJS IDR 292,063 BPJS-Tek IDR 83,130 BPJS- Kes IDR 27,710 Loan - Cooperative contribution IDR - Union labor contribution IDR - Tax PPH21 IDR 56,635 Sub total IDR 459,538 Net Salary IDR 5,977,220 | Pay Slip on August Period Belian Estate Employee : Sukiyono NIP : 1111701 Position : Harvester Basic Salary IDR 2,757,009 Premium IDR 2,331,594 BPJS-Tek (allowance) IDR 180,308 BPJS-Kes (allowance) IDR 110,280 Pruning premium IDR 631,670 Sub total IDR 6,010,861 Deduction BPJS IDR 290,588 BPJS-Tek IDR 82,710 BPJS- Kes IDR 27,570 Loan - Cooperative contribution IDR - Union labor contribution IDR 1,500 Tax PPH21 - Sub total IDR 402,368 Net Salary IDR 5,608,493 | |

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| | | Based on verification of pay slip documents and interviews with sample workers, the implementation of wages, including pay slips given to workers, is in accordance with applicable regulations and laws. | |
| 6.2.3 | <p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p> | <p>The implementation of regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labor requirements have been complied to the regulations and legal requirement.</p> <p>Working hours is set for maximum 40 hours per week and working from Monday to Saturday, salary provided referring to Regent Decree of Kapuas Hulu 1869/NAKERTRAN/2023 regarding "UMK Kapuas Hulu Tahun 2024", dated 29 Nov 2023, IDR 2,746,009.44 per month. Permanent workers are given salary, determined by the employer that it is not lower than government regulations.</p> <p>Certain permanent workers are given wages (Basic Salary and Rice allowance) in accordance with the status of the group/level which value is determined by the employer with provisions not lower than government regulations.</p> <p>Rice allowance for employee is given include in basic salary, for spouse is 9 kg, and for children (maximum 3 children) is 7.5 kg per month. Rice allowance is given monthly in form of money.</p> <p>Based on interview with worker representatives, they all admit have received monthly salary including allowance, annual leave, menstruation and maternity leave for female worker, adequate housing, electricity, clean water, access for food and education for children, and there are free to resign from the company with one month notice. There is no document in hold, debt bondage or withholding of wages. There is no complaint from the employees regarding employments.</p> <p>OFI:</p> | OFI |

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Based on interviews with workers during field visits to electricity-generator operators and water distribution at BLNM, BLNE and TKNE, they stated that they work full time for 1 month and do not have a 1 day break in a week.

- BLNM worker on behalf of A. K***** *****
- BLNE worker on behalf of M*****
- TKNE worker on behalf of S*****

Worker Absence

| Worker | Month | | | Remarks |
|-------------------------------------|-----------|-----------|-----------|---------------|
| | June | July | August | |
| A. K***** ***** | | | | |
| - Mandays | 23 | 23 | 24 | |
| - Leave | | 4 | 3 | |
| - Sunday/Holiday (holiday Overtime) | 7 | 4 | 4 | 07.00 - 13.00 |
| Total | 30 | 31 | 31 | |

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| Worker | Month | | | Remarks |
|---------------|-------|------|--------|---------|
| | June | July | August | |
| M***** | | | | |
| - Mandays | 23 | 27 | 26 | |

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| | | | - Leave | | | | |
|--|-----------|-----------|--|---------------|-----------|-----------|---------------|
| | | | - Sunday/Holiday (holiday Overtime) | 6 | 4 | 5 | 07.00 - 13.00 |
| | | | Total | 29 | 31 | 31 | |
| | | | | | | | |
| | | | | | | | |
| Worker | Month | | | Remarks | | | |
| | June | July | August | | | | |
| S***** | | | | | | | |
| - Mandays | 23 | 27 | 26 | | | | |
| - Leave | | | | | | | |
| - Sunday/Holiday (holiday Overtime) | 7 | 4 | 5 | 07.00 - 13.00 | | | |
| Total | 30 | 31 | 31 | | | | |
| <p>Based on the absence verification (fingerprint) above, it can be seen that the worker worked for 30-31 days in one full month without a break/holiday of 1 day a week.</p> <p>Based on PP no. 35/2021 clause 22 stated:</p> <p>Employers who employ Workers/Laborers during working hours as referred to in Article 21 paragraph (2) are required to provide weekly rest time to Workers/Laborers including:</p> <p>a. Weekly rest of 1 (one) day for 6 (six) working days in 1 (one) week; or</p> | | | | | | | |

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| | | <p>b. Weekly rest of 2 (two) days for 5 (five) working days in 1 (one) week.</p> <p>Based on Collective Labour Agreement/PKB PT Paramitra Internusa Pratama period 2022 – 2024</p> <p>CHAPTER IV; Working Days and Working Hours</p> <ol style="list-style-type: none"> Working days in the company are set at 6 working days a week Working days are set from Monday to Saturday and Sunday is a rest day. | |
| 6.2.4 | <p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p> | <p>The unit of certification has provided adequate housing. Public facilities were provided by the organization and covered residential facilities, day care, kindergarten, building for prayers, sports facility e.g. volley ball, badminton, football, etc. Housing for workers and medical facilities (clinics) were provided by the organization with basic facilities.</p> <p>The uses of water for employees' daily needs of are met by utilizing rainwater catchment ponds. In the event of not enough water in the ponds, then it can use water from the mill. Clean water provided for employees housing sourced from palm oil mill water treatment. Water analysis/testing have been done based on the laboratory analysis report of clean water.</p> <p>Electricity provided to employees through provision of electricity generator with the capacity 65 – 85 KVA.</p> | Complied |

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| | | List of Public Facilities | | | |
| | | Tengkawang Estate | | | |
| | | No | Type | Unit | Quantity Condition |
| | | 1 | Mosque | Unit | 1 Good |
| | | 2 | Church | Unit | 1 Good |
| | | 3 | Childcare Center | Unit | 1 Good |
| | | 4 | Playgroup | Unit | 1 Good |
| | | 5 | Eka Tjipta Tengkawang Junior High School | Unit | 1 Good |
| | | 6 | Healthy Home | Unit | 1 Good |
| | | 7 | G-1 Housing (Permanent) | Unit | 14 Good |
| | | 8 | G-2 Housing (Permanent) | Unit | 135 Good |
| | | 9 | Futsal Court | Unit | 1 Good |
| | | 10 | Volleyball Court | Unit | 1 Good |
| | | 11 | Badminton Court | Unit | 1 Good |
| | | List of Public Facilities | | | |
| | | Belian Mill | | | |
| | | No | Type | Unit | Quantity Condition |
| | | 1 | Housing G-2 and G-1 (permanent) | Unit | 160 Good |
| | | 2 | Clean water | Unit | flowed from WTP |
| | | 3 | Electricity | Unit | 2 genset |
| | | 4 | Kindergarten | Unit | 1 Good |
| | | 5 | Elementary school | Unit | 1 Good |
| | | 6 | Junior high school | Unit | 1 Good |
| | | 7 | Child care | Unit | 1 Good |
| | | 8 | G-2 Housing | Unit | 1 Good |
| | | 9 | Futsal Court | Unit | 1 Good |
| | | 10 | Volleyball Court | Unit | 1 Good |
| | | 11 | Badminton Court | Unit | 1 Good |

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| | | <table><tr><th colspan="5">List of Public Facilities</th></tr><tr><th colspan="5">Belian Estate</th></tr><tr><th>No</th><th>Type</th><th>Unit</th><th>Quantity</th><th>Condition</th></tr><tr><td>1</td><td>Mosque</td><td>Unit</td><td>1</td><td>Good</td></tr><tr><td>2</td><td>Church</td><td>Unit</td><td>1</td><td>Good</td></tr><tr><td>3</td><td>Childcare Center</td><td>Unit</td><td>1</td><td>Good</td></tr><tr><td>4</td><td>Playgroup</td><td>Unit</td><td>1</td><td>Good</td></tr><tr><td>5</td><td>Eka Tjipta Tengkawang Junior High School</td><td>Unit</td><td>1</td><td>Good</td></tr><tr><td>6</td><td>Clinik</td><td>Unit</td><td>1</td><td>Good</td></tr><tr><td>7</td><td>G-1 Housing (Permanent)</td><td>Unit</td><td>15</td><td>Good</td></tr><tr><td>8</td><td>G-2 Housing (Permanent)</td><td>Unit</td><td>140</td><td>Good</td></tr><tr><td>9</td><td>Futsal Court</td><td>Unit</td><td>1</td><td>Good</td></tr><tr><td>10</td><td>Volleyball Court</td><td>Unit</td><td>1</td><td>Good</td></tr><tr><td>11</td><td>Badminton Court</td><td>Unit</td><td>1</td><td>Good</td></tr></table> <p>Based on interview with worker representatives, they all admit have received adequate housing, electricity, clean water, access for food and education for children. There is no complaint from the employees regarding facilities.</p> <p>Clean water testing is carried out once a year, the last time it was carried out on March 8-11, 2024 through the Unilab Perdana laboratory. This clean water testing is based on the quality standards of the Minister of Health Regulation No. 2 of 2023 concerning Environmental Health.</p> <p>The company also provides a health clinic for its employees, namely the Belian Clinic. The letter has submitted an extension of its establishment permit to the Kapuas Hulu District Health Office through a letter from PT Paramitra Internusa Pratama no. 148/EL/PIP-DINKES Kab.Kapuas Hulu/VII/2024 dated August 20, 2024 concerning the Application for a Permit to Establish and Operate the Belian Clinic.</p> | List of Public Facilities | | | | | Belian Estate | | | | | No | Type | Unit | Quantity | Condition | 1 | Mosque | Unit | 1 | Good | 2 | Church | Unit | 1 | Good | 3 | Childcare Center | Unit | 1 | Good | 4 | Playgroup | Unit | 1 | Good | 5 | Eka Tjipta Tengkawang Junior High School | Unit | 1 | Good | 6 | Clinik | Unit | 1 | Good | 7 | G-1 Housing (Permanent) | Unit | 15 | Good | 8 | G-2 Housing (Permanent) | Unit | 140 | Good | 9 | Futsal Court | Unit | 1 | Good | 10 | Volleyball Court | Unit | 1 | Good | 11 | Badminton Court | Unit | 1 | Good | |
|---------------------------|--|--|---------------------------|-----------|--|--|--|---------------|--|--|--|--|----|------|------|----------|-----------|---|--------|------|---|------|---|--------|------|---|------|---|------------------|------|---|------|---|-----------|------|---|------|---|--|------|---|------|---|--------|------|---|------|---|-------------------------|------|----|------|---|-------------------------|------|-----|------|---|--------------|------|---|------|----|------------------|------|---|------|----|-----------------|------|---|------|--|
| List of Public Facilities | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Belian Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| No | Type | Unit | Quantity | Condition | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Mosque | Unit | 1 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Church | Unit | 1 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Childcare Center | Unit | 1 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Playgroup | Unit | 1 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Eka Tjipta Tengkawang Junior High School | Unit | 1 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Clinik | Unit | 1 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | G-1 Housing (Permanent) | Unit | 15 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | G-2 Housing (Permanent) | Unit | 140 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Futsal Court | Unit | 1 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Volleyball Court | Unit | 1 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | Badminton Court | Unit | 1 | Good | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6.2.5 | <p>The unit of certification makes efforts to improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p> | <p>The unit of certification has allowed the employee to open several stores around employee housing, that provide daily basic necessary.</p> <p>Markets located in Semitau District with the range of +/- 2 Km, every payday trader will come to estate location to trade basic needs of</p> | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | employees. Access to the market is always maintained using graders and compactors regularly, therefore it can be passed at all season. | |
| 6.2.6 | <p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p> <p>- Minor compliance -</p> | <p>The unit of certification has calculated the in-kind benefits for year 2024 given to all workers according to regulations including workers who work on a piece/quota basis, whose wage calculation is based on a quota that can be reached during regular working hours.</p> <p>The unit of certification calculates in-kind benefits year 2024 using the benefit approach that the company has provided to workers, including working tools, rice allowances, facilities (provision of facilities: schools (including school transportation), housing, clean water, polyclinics (health), etc, with the following calculations:</p> <p>Monthly payments for workers were determined according to daily attendance. Daily attendance for workers were recorded and managed by Assistant through manual records and fingerprint system for mill and estate office. Whilst attendance for field employee in estate such as harvesters and upkeep workers were recorded manually by each foreman using attendance form. It was evident that the wage was paid according working hours and daily attendance. According to pay list of employee and interview result with worker, it was indicated that wage received by the workers was complied with the determined regulations.</p> <p>Unit of certification calculates in-kind benefits for year 2022 using the benefit approach that company provided to workers, including working allowance, rice allowances, facilities (such as schools-including school transportation, housing, clean water, clinics (health), etc., with the following consideration:</p> <ul style="list-style-type: none"> • Basic salary • THR allowance per month • Rice allowance • Electrical allowance | Complied |

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| | | <ul style="list-style-type: none"> • Housing facilities • Clean Water facilities • School • Medical facilities (Clinic) • Kindergarten <p>Based on the calculation, in-kind benefits paid by the company to employees was IDR 3,212,107 (Free Labour/Casual Worker) and highest is IDR 4,061.101 (Permanent Employee/Monthly Employee).</p> <p>Unit of certification applied employment wages refer to Regency Minimum Wage of Kapuas Hulu or "Upah Minimum Kabupaten Kapuas Hulu Year 2024". The minimum wage is referred to Regent of Kapuas Hulu Decree No: 1869/NAKERTRAN/2023 regard "UMK Kapuas Hulu Tahun 2022", dated 29 Nov 2023, IDR 2.746.009.44.</p> <p>Thus, the calculation in kind benefit in PT PIP for a period of year 2024 has been in excess of the minimum wage set by the government by 17%-47.9%.</p> | |
| <p>PROCEDURAL NOTE:</p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p> | | | |
| 6.2.7 | Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. | Based on verification during onsite visit, Certificate Holder using permanent worker (PT: Pekerja Tetap) for all core work and specified contracted worker (PKWT) for maintenance work. | Complied |

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| | - Minor compliance - | <p>Unit of certification has established policies and mechanisms related to Work Agreements/Contracts (Work Environment and Industrial Relations) Policy No. KHI-smart/002-00 dated 1 August 2017, this policy describes:</p> <ul style="list-style-type: none"> • An employment agreement or contract • Position or type of work • Workplace • Amount wages and the method of payment • Conditions of work that contain the rights and obligations of entrepreneurs and workers / laborers • Starting and validity period of the work agreement. Furthermore, there was also explained a Specific Time Work Agreement (PKWT) based on a certain period can be differentiated for a maximum of 2 (two) years and can only be extended once for a maximum period of 1 (one) year. <p>Sample seen:</p> <ul style="list-style-type: none"> - Spesific Time Work Agreement No. 046/Work Unit/PKWT-SH/Div5/09/2024 dated September 3, 2024 in the name of Nia Yunita as a Berondolan Collector at TNKE until September 2, 2025. - Spesific Time Work Agreement No. 046/Work Unit/PKWT-SH/Div5/09/2024 dated September 3, 2024 in the name of Nia Yunita as a Berondolan Collector at TNKE until September 2, 2025. | |
| Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel. | | | |
| 6.3.1 | (C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained | There was no changes related to the policy regarding freedom of association and right to collective bargaining in national languages as | Complied |

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| | <p>to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p> | <p>per "<i>Kebijakan Hubungan Industrial – Kebebasan Berserikat</i>", nomor: KHI-SMART/018-00.</p> <p>This policy has socialized to the all workers:</p> <ul style="list-style-type: none"> - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 24 – 28 June 2024 at Tengkwang Estate attended by 267 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 17 May, 9 September, 30 July and 26 July 2024 at Belian Estate attended by 75 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 29 February 2024 at Belian Mill attended by 27 participants. <p>Workers at PT PIP have established a labor union named Serikat Pekerja Mandiri (SPM). This labor union has been registered to the Dinas Tenaga Kerja dan Transmigrasi Kabupaten Kapuas Hulu Regs. No. 560/003/DTTS-SPSB/2016 at Belian Estate, at the Tengkwang Estate Regs. No. 554/003/DTTS/SPSB/2023 and at the Belian Mill Regs. No. 560/003/DTTS/SPSB/2023.</p> <p>Because there is a change in the list of SPM administrators, the workers' union has submitted an application for ratification of the list of administrators of the Sereikat Pekerja Mandiri for the period 30 August 2024 to 30 August 2026 to the Manpower and Transmigration Office of Kapuas Hulu Regency on 30 August 2024.</p> | |
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| | | <p>During this audit, unit of certification has shown the renewal of registration process of collective labor agreement to the Labor Agency of Kapuas Hulu Regency dated 09 October 2021.</p> <p>Based on interview with labor union representatives obtained information that the collective labor agreement has been disseminated to all labor union members.</p> | |
| 6.3.2 | <p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p> <p>- Minor compliance -</p> | <p>In the 2024 period, several meetings between the Independent Workers Union and Management:</p> <ul style="list-style-type: none"> - Dated April 5, 2024, discussed related to the delivery of the minimum wage for Kapuas Hulu Regency and activating environmental cleaning through the Clean Friday program at BLNE. - June 18, 2024, discussion on changes to the TNKE SPM structure and discussion on the new 2024 UMK that has been determined. - July 17, 2024, discussion regarding the Submission of the 2024 UMK which has been determined and the formation of the committee on August 17, 2024. <p>The results of this union meeting are presented in Indonesian and can be accessed by all PT PIP workers.</p> | Complied |
| 6.3.3 | <p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p> <p>- Minor compliance -</p> | <p>Based on data verification and interviews with several employees and Chairman of Serikat Pekerja Mandiri PT Paramitra Internusa Pratam during this assessment – August 2024, unit of certification has facilitated space/rooms for workers union to carry out their activities and conduct monthly meetings.</p> <p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers. Other than that, there is no discrimination or unfair treatment to the board of labor union.</p> | Complied |

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| Criteria 6.4: Children are not employed or exploited. | | | |
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| 6.4.1 | <p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p> | <p>There was no change related to the policy for minimum age for worker and mentioned in "<i>Kebijakan Hubungan Industrial – Pekerja / Buruh Anak</i>", (KHI-SMART/003-00). The policy stated that the company prohibit the use of child labor and take measure to prevent the use of such labor in connection with their activities; the company will employ remedial action in case that the child labour is uncovered to ensure appropriate follow up on and assistance for protection of the child's welfare; the company ensure to access to education for all children whose parents/guardians work on plantations. The policy is publicly available, and stakeholder can access it upon request.</p> <p>For children under 5 years, the company has provided child-care (Balai Penitipan Anak - BPA) which located at each Emplacement. Based on field observation to child-care unit at Belian Estate and Tengawang Estate on 9 Dec 2022, the facility and children were in good condition.</p> <p>In the cooperation contract agreement with the local contractor, it describes compliance with the applicable regulatory and statutory requirements in Article 6, states that; The Second Party (Contractor) is obliged to follow the applicable government regulations in providing vehicles and drivers, including but not limited to manpower and tools to carry out work... ”.</p> <p>Article 7: The second party (Contractor) is obliged to comply with the applicable labour regulations, especially with regard to the payment of wages and the age of workers, which have to be 18 (eighteen) years of age. As well as complying with the prohibition on the employment of children, forced labour and workers from human trafficking and must comply with the company's business ethics and comply with all certification requirements and standards.</p> | Complied |

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| | | <p>This policy has socialized to the all workers:</p> <ul style="list-style-type: none"> - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 24 – 28 June 2024 at Tengawang Estate attended by 267 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 17 May, 9 September, 30 July and 26 July 2024 at Belian Estate attended by 75 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 29 February 2024 at Belian Mill attended by 27 participants. <p>Based on interviews with a sample of workers during field visits and several stakeholders, PT PIP operations do not employ child workers (under 18 years of age).</p> | |
| 6.4.2 | <p>(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p> <p>- Critical (Major) compliance -</p> | <p>Unit of certification has policy for minimum age of worker and mentioned in "<i>Kebijakan Hubungan Industrial – Pekerja / Buruh Anak</i>", (KHI-SMART/003-00). The policy stated that the company prohibit the use of child labor and take measure to prevent the use of such labor in connection with their activities; the company will employ remedial action in case that the child labour is uncovered to ensure appropriate follow up on and assistance for protection of the child's welfare; the company ensure to access to education for all children whose parents/guardians work on plantations. The policy is publicly available, and stakeholder can access it upon request.</p> <p>Minimum age for worker is 18 years old. Based on list of employees and interview with workers, verified that there is no worker under 18 years</p> | Complied |

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| | | <p>old at Belian POM, Belian Estate and Tengkawang Estate during this initial assessment.</p> <p>Based on verification of Employee master on periode August 2024, that there were empolyee recruited under 18 years old.</p> <p>Youngest age based on worker list, such as:</p> <ul style="list-style-type: none"> • Tengkawang Estate, the youngest worker at the time of recruitment was Natalia Desy, born on 12/28/2004, joined on 06/07/2023 or at the age of 18 years 86 months. • Belian Mill, the youngest worker at the time of recruitment was Jeksi Asmara, born on 2/09/1998, joined on 26/09/2016 or at the age of 18 years 1 months. • Belian Estate, the youngest worker at the time of recruitment was Jeksi Asmara, born on 2/09/1998, joined on 26/09/2016 or at the age of 18 years 1 months. <p>Based on review to employee's personal document, there are no workers under 18 years old during recruitment.</p> <p>Based on the verification of the recruitment process in 3.5.2 above, there was no recruitment of workers under the age of 18 years. All recruitment documents have copy of identity card, to verified how old the candidate is at the time of recruitment.</p> | |
| 6.4.3 | <p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p> | <p>Unit of certification straight to the policy that minimum age for worker is 18 years old. Based on list of employees and interview with workers, verified that there is no worker under 18 years old at Belian POM, Belian Estate and Tengkawang Estate during this initial assessment. Based on review to employee's personal document, there are no workers under</p> | Complied |

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| | | 18 years old during recruitment. Based on interview with workers, they said that children were prohibited from entering the work site. | |
| 6.4.4 | <p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p> | <p>The GSEP (GAR Social Environment Policy) and policy "<i>Kebijakan Hubungan Industrial – Pekerja / Buruh Anak</i>", (KHI-SMART/003-00). The policy stated that the company prohibit the use of child labor and take measure to prevent the use of such labor in connection with their activities; the company will employ remedial action in case that the child labour is uncovered to ensure appropriate follow up on and assistance for protection of the child's welfare; the company ensure to access to education for all children whose parents/guardians work on plantations. The policy is publicly available, and stakeholder can access it upon request.</p> <p>This policy has socialized to the all workers:</p> <ul style="list-style-type: none"> - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 24 – 28 June 2024 at Tengkawang Estate attended by 267 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 17 May, 9 September, 30 July and 26 July 2024 at Belian Estate attended by 75 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 29 February 2024 at Belian Mill attended by 27 participants. <p>Based on list of employees and interview with workers, verified that there is no worker under 18 years old at Belian POM, Belian Estate and Tengkawang Estate during this initial assessment. Based on review to employee's personal document, there are no workers under 18 years old</p> | Complied |

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| | | during recruitment. Based on interview with workers, they said that children were prohibited from entering the work site | |
| Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected. | | | |
| 6.5.1 | <p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p> | <p>Policy to prevent sexual and all other form of harassment and violence was determined at "<i>Kebijakan Hubungan Industrial – Pelecehan Seksual</i>" (KHI-SMART/016-00). This policy is publicly available, and stakeholder can access it upon request.</p> <p>This policy has socialized to the all workers:</p> <ul style="list-style-type: none"> - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 24 – 28 June 2024 at Tengkawang Estate attended by 267 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 17 May, 9 September, 30 July and 26 July 2024 at Belian Estate attended by 75 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 29 February 2024 at Belian Mill attended by 27 participants. <p>Based on an interview with the head of the gender committee, that until now there has been no violence and sexual harassment in the period of 2024, although in 2023 there was sexual harassment of a female worker (Clinical Nurse at TNKE) on behalf of He** Ka****. This incident has been followed up and reported to the Kapuas Hulu Regency Police. Meanwhile, the victim (female worker) has received her rights (severance pay, BPJS Tek insurance and separation money) and has</p> | Complied |

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| | | been given to the worker's heirs in accordance with applicable regulations and laws (PP No. 35/2021). | |
| 6.5.2 | <p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p> | <p>A policy to protect the reproductive rights of all, especially of women, is documented under "<i>Kebijakan Hubungan Industrial – Pekerja Perempuan</i>" (KHI-SMART/005-00). In point 2.5, mentioned that menstruation leave is given to female worker for 2 days-off without any salary deduction. The company allowed female workers to breastfeed their children up to nine months before resuming chemical spraying or manuring, and they are given specific break times to enable effective breastfeeding.</p> <p>On Point 2.5.4: described: Female workers/laborers who are still breastfeeding are given the appropriate opportunity to breastfeed their children if this must be done during working hours.</p> <p>This policy has socialized to the all workers:</p> <ul style="list-style-type: none"> - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 24 – 28 June 2024 at Tengkawang Estate attended by 267 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 17 May, 9 September, 30 July and 26 July 2024 at Belian Estate attended by 75 participants. - Minutes of Socialization of Human Rights Policy, KSLG (GAR Social and Environmental Policy), K3 Policy and KHI (Industrial Relations Policy) on 29 February 2024 at Belian Mill attended by 27 participants. <p>Pregnancy test is only conducted to check whether female worker, especially spraying and manuring worker, pregnant or not. It is not</p> | Complied |

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| | | <p>conducted as discriminatory measure. Pregnant workers can still work in alternative types of work that does not contain chemical material or jobs that require heavy loads. In case of female worker's pregnancy test is positive, then she will be rotated to other types of work for temporary. During 2024 (according to pregnancy monitoring) there is no spraying or fertilizing employees who was pregnant, then no work transfer implemented due to pregnancy.</p> <p>Pregnancy monitoring is performed using monitoring of H1 (menstruation) leave, if no H1 leave requested by workers then test pack will be implemented by company clinic, (see on 6.1.4 above).</p> <p>The company has provided lactation room and time allocation for breastfeeding. For children under 5 years, the company has provided child-care (<i>Balai Penitipan Anak</i> - BPA) which located at each Emplacement. Based on field observation to child-care unit at Belian Estate and Tengawang Estate on 9 Dec 2022, the facility and children were in good condition.</p> <p>Based on interview with spraying and manuring workers in Belian Estate and Tengawang Estate, confirmed that there is no pregnant or breastfeeding worker who works as spraying or fertilizer applicator.</p> | |
| 6.5.3 | <p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p> | <p>The company has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs in accordance with applicable regulations in Indonesia. The company and workers union has agreed on breastfeeding time, as stipulated in Collective Labour Agreement (PKB) – company provides sufficient opportunity for female worker to breastfeed their children.</p> <p>Consultation conducted via questionnaire "<i>Formulir Interview dengan Ibu Baru Bersalin/Menyusui</i>". The questionnaire are cover status of work; presence of children needing breastfeeding; exclusive breastfeeding; breastfeeding frequency; breastfeeding timeframe; permission from company for breastfeeding time; breastfeeding</p> | Complied |

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| | | <p>frequency during working hour; breastfeeding time adequate; provision of specific place for breastfeeding; pay deduction for time used during breastfeeding time; Provision of access to information related to breastfeeding consultation, baby health and vaccination.</p> <p>Identification of the Needs of Newly Born and Newly Breastfeeding Mothers – Gender Committee:</p> <p>A survey was conducted on 40 new and breastfeeding mothers and it was concluded that there were several needs, namely:</p> <p><u>Needs for young/new mothers:</u></p> <ul style="list-style-type: none"> - Nutritional needs before pregnancy - Fetal/womb development - Baby delivery equipment: the company has provided mats and swaddling clothes to new mothers - Baby care training - Understanding of adequate nutrition <p><u>Needs for new mothers:</u></p> <ul style="list-style-type: none"> - Provision of blood-boosting vitamins - Provision of a guidebook for mothers and babies - Socialization of the characteristics of healthy children - Socialization of formula milk - Benefits of integrated health posts and immunization <p><u>Needs for children:</u></p> <ul style="list-style-type: none"> - Provision of vitamins - Provision of complete immunization - Provision of first aid drugs for the baby's umbilical cord | |
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| | | <p>- Integrated health posts</p> <p>The company has provided lactation room and time allocation for breastfeeding. For children under 5 years, the company has provided child-care (<i>Balai Penitipan Anak</i> - BPA) which located at each Emplacement.</p> | |
| 6.5.4 | <p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p> | <p>Unit of certification has defined A grievance mechanism, which respects anonymity and protects complainants, where requested as per "<i>Kebijakan Hubungan Industrial – Penanganan Keluhan</i>" (KHI-SMART/019-000). All complaints can be issued verbal and or written and informed whether to Gender Committee or Estate / Mill Manger.</p> <p>Based on review the document of "<i>Pencatatan Keluhan dan Ketidak Puasan 2024</i>" – complaints logbook as well as interview with workers representatives, there was no grievance reported up to August 2024 in each unit of Belian Mill, Belian Estate and Tengawang Estate.</p> | Complied |
| Criteria 6.6: No forms of forced or trafficked labour are used. | | | |
| 6.6.1 | <p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages | <p>The company has established and documented policy called GSEP (GAR Social and Environmental Policy) dated 1 Oct 2015. On chapter 3 (Work Environment and Industrial Relations) stated the company is recognize, respect and strengthen the right of all workers including contract, temporary, casual and migrant workers of all genders, inline with international best practices where legal frameworks are not yet in place, e.g. the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.</p> <p>The GSEP (GAR Social and Environmental Policy) stated Responsible employment, that covers:</p> <ul style="list-style-type: none"> - Practice ethical recruitment including prohibiting the charging of recruitment fees to workers and retention of identity documents; | Complied |

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| | - Critical (Major) compliance - | <ul style="list-style-type: none"> - Prohibit the use of child labour; - Ensure access to education for all children; - Prohibit the use of forced or bonded labour; - Provide employment contracts to all workers in a language they understand; - Ensure wage administration including distribution, schedules and language used are direct, timely and clear; - Ensure all workers are paid a wage equal to or exceeding the legal minimum wage; - Ensure working hours meet legal requirements; - Ensure all overtime is voluntary and compensated at a premium rate consistent with national law or Collective Labour Agreement (CLA). <p>Based on interviews with sample workers during field visits, trade unions and gender committees, that until now, there has been no retention of workers' personal documents, payment of fees and substitution contracts at the time of recruitment. In addition, workers also stated that there were no cases related to forced overtime, work due to debt and child labor.</p> | |
| 6.6.2 | <p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p> | <p>Unit of certification has established policies and mechanisms related to Work Agreements/Contracts as per Work Environment and Industrial Relations Policy (KHI-SMART/002-00 dated 1 August 2017, this policy describes:</p> <ul style="list-style-type: none"> • An employment agreement or contract; • Position or type of work; • Workplace; • Amount of wages and the method of payment; • Conditions of work that contain the rights and obligations of the | Complied |

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| | | <p>company and workers;</p> <p>Starting and validity period of the work agreement. Furthermore, there was also explained a Specific Time Work Agreement (PKWT) based on a certain period can be differentiated for a maximum of 2 (two) years and can only be extended 1 (one) time for a maximum period of 1 (one) year.</p> <p>Based on Employee Master per August 2024, PT PIP is used a PKWT Specific Time Wokr Agreement, as follow:</p> <ul style="list-style-type: none"> - The use of PKWT workers at Belian Estate is 31 workers. - The use of PKWT workers at Tengawang Estate is 99 workers. <p>Meanwhile, for Mill purchases there are no workers with PKWT status.</p> <p>The following is a sample document for a PKWT worker agreement:</p> <ul style="list-style-type: none"> - Spesific Time Work Agreement No. 046/Work Unit/PKWT-SH/Div5/09/2024 dated September 3, 2024 in the name of Nia Yunita as a Berondolan Collector at TNKE until September 2, 2025. - Spesific Time Work Agreement No. 046/Work Unit/PKWT-SH/Div5/09/2024 dated September 3, 2024 in the name of Nia Yunita as a Berondolan Collector at TNKE until September 2, 2025. | |
| Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health. | | | |
| 6.7.1 | <p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p> | <p>The company already has a P2K3 structure which is ratified based on the decision of the head of the West Kalimantan Provincial Manpower and Transmigration Office Number: 108 Nakertran Year 2024 concerning the Determination of the Occupational Safety and Health Supervisory Committee (P2K3) at PT Paramitra Internusa Pratama - Belian Estate Unit on 2 August 2024 with the Chairperson of the Estate Manager and the Secretary is Sustainability Staff "Dimas Ade Sapurtra".</p> | Complied |

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| | | <p>Dimas Ade Saputra is a General OHS Expert who has been appointed based on the Decree of the Minister of Manpower of the Republic of Indonesia with number 5/15887/AS.01.03/X/2023 concerning the appointment of General Occupational Safety and Health Expert of the Minister of Manpower of the Republic of Indonesia on 12 October 2023 and is valid until 12 October 2026.</p> <p>The safety committee (P2K3) regular meeting has been performed monthly, discussing regarding OHS plan achievement and corrective actions to achieve target and improve the program. Notes of Safety Committee Regular Meeting (mill and estate) available in August 2024, among others discussed as follows:</p> <ul style="list-style-type: none"> • Preparation for external audit, • Personal Protective Equipment (PPE), • Safety notes, • Inspection of non-compliance at each department. <p>The company has also shown evidence of submitting P2K3 reports regularly every quarter to the West Kalimantan Provincial Manpower and Transmigration Office. The last reporting for the 2nd quarter of 2024 was on 8 August 2024.</p> | |
| 6.7.2 | <p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p> | <p>Unit of certification has defined the procedure for emergency response preparedness under "<i>SOP Kesiapsiagaan Tanggap Darurat</i>" (SOP/SMART/UMUMSADV/I/2005) dated 30 May 2014, and also procedure on occupational accidents and disease under "<i>SOP Penanganan Kecelakaan dan Penyakit Akibat Kerja</i>" No.SOP/SMART/HESS-EHSD/SADV/I/2005" dated 1 July 2014.</p> <p>The procedure described the roles and responsibilities of each emergency response team personnel, include the mechanism how to conduct medical evacuation to nearest hospital/local health center. Emergency contact number of each internal emergency team and</p> | Complied |

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| | | <p>external related parties were evident. Evacuation route and muster point are available and made known to the employee.</p> <p>Accident and investigation reports described accident chronology, cause and impacts of the accident, analyzing root causes of the accident and determine correction and corrective action. Records of all accidents were kept and periodically reviewed for continuous improvement.</p> <p>Belian Mill has assigned the first aider as per Mill Manager decree letter dated 9 Oct 2021.</p> <ul style="list-style-type: none"> Based on field observation to harvesting, spraying and upkeep activities in estates and to FFB processing activities at mill as well, first aid equipment are available and sufficient. At field, first aid kit brought by the Mandor (supervisor), whilst at mill, first aid kit located at office and processing station. <p>Training and emergency drill records:</p> <ul style="list-style-type: none"> Record of refreshment training for first aider, dated 20 February 2024 and 6 September 2024, kepada kerani, mandor, kepala gudang dan operator Training was delivered by Company Doctor. Attendance list, photograph and training material were available. Record of training/drill/simulation emergency response and preparedness as per document of "<i>Simulasi Tanggap Darurat Gabungan 2024</i>", was conducted on 1 August 2024, attended more than 50 participants. Available attendance list, photograph, scenario and evaluation report. Accident reports are available as per "<i>Laporan Kecelakaan Kerja</i>". Reported in Belian Mill, Belian Estate and Tengkawang Estate period January – August 2024 there was accident occurred. | |
| 6.7.3 | (C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine | PT Paramitra Internusa Pratama – Belian Mill, Belian Estate and Tengkawang Estate has demonstrated that workers use appropriate Personal Protective Equipment (PPE) which is provided free of charge to | Complied |

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| | <p>operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p> | <p>cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities called "<i>Rumah Bilas</i>" for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing.</p> <p>The company has shown PPE stock until September 2024 for Estate and Mill in the form of boots and safety shoes, cloth gloves, rubber gloves, leather gloves, aprons, welding aprons, helmets, masks, life jackets, earplugs and earmuffs, welding hoods, safety glasses, face shields. PPE stock is always available to replace damaged employee PPE.</p> <p>Here are some examples of PPE handover to employees:</p> <ul style="list-style-type: none"> - Minutes of PPE handover to 9 spray workers in the form of rubber gloves and aprons on 23 August 2024. - Minutes of PPE handover to workshop Mill workers in the form of 8 pairs of long safety shoes on 18 March 2024. - Minutes of PPE handover for Mill process workers in the form of 19 pairs of long safety shoes on 9 February 2024. - Minutes of PPE handover for estate maintenance workers in the form of 26 pairs of AP boots on 29 February 2024. - Minutes of PPE handover for Estate maintenance workers in the form of AP boots total 23 pairs on 19 February 2024. - Minutes of the handover of PPE for Estate tool operators in the form of Safety Shoes total 25 pairs on 13 February 2024. - Minutes of the submission of PPE for harvesters in the form of AP boots total 30 pairs on 1 March 2024. <p>The company has shown evidence of inspections for non-disciplinary use of PPE on 18 January 2024, 6 March 2024, 25 April 2024, and 30 April 2024.</p> | |
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| | | <p>Based on the results of field visits to harvest, spray, fertilizer and other operations, workers have used PPE in full of the type of PPE that is in accordance with the hazards identified in the HIRAC.</p> <p>The company has also provided PPE washing stations and bathrooms in each Estate for employees working with chemicals such as sprayers and fertilizers.</p> | |
| 6.7.4 | <p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p> | <p>All workers in mill and estates have been covered by Medical and Social Insurance (BPJS), as required by applicable regulation. Records of insurance payment available in:</p> <ul style="list-style-type: none"> • BPJS registration number • Monthly BPJS insurance payment. <p>The records of monthly payment for national incident insurance (BPJS) with percentage 0.54 % from the wages are evident. The reports of monthly payment were evident or period September 2024.</p> <p>Proof of payment of BPJS health and employment for Estate for the period of August 2024 on August 9, 2024.</p> <p>Proof of payment of BPJS Health and employment for Mill for the period of August 2024 on August 8, 2024.</p> <p>In addition, the company has also provided an adequate clinic for employee treatment when sick or injured due to work accidents, the clinic has a license from the local health office and has a doctor in charge.</p> | Complied |
| 6.7.5 | <p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p> | <p>Occupational injuries are recorded using Lost Time Accident (LTA) and documented in "<i>Laporan Kecelakaan Kerja</i>". Accident and investigation reports described accident chronology, cause and impacts of the accident, analyzing root causes of the accident and determine correction and corrective action. Records of all accidents were kept and periodically reviewed for continuous improvement.</p> | Complied |

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| | | <p>On April 20, 2024, there was an accident that resulted in a fatality that occurred at the Mill (Mechanical Employee). The company has shown evidence of the results of the investigation into the accident that resulted in the death.</p> <p>The company has also shown evidence of reporting stage I and stage II work accident cases to BPJS Ketenagakerjaan on April 20, 2024.</p> <p>Proof of payment of death benefits has been received by the heirs concerned with the determination number of work accident insurance for wage earners: JKKP05052024KL24052103971752.</p> <p>All work accidents that occur have been discussed in the P2K3 monthly meeting and have received follow-up and changes in the HIRAC.</p> <p>The company has shown evidence of work accident prevention which is expressed in Lost Time Accident (LTA) calculation is 2.87 FR and 17,246.35 SR. Total working hour is 347,900 hours.</p> | |
| Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources. | | | |
| Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques. | | | |
| 7.1.1 | <p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p> | <p>The unit of certification has plans to implement Integrated Pest Management (IPM) activities stated in IPM procedures as follows:</p> <ul style="list-style-type: none"> • Procedure No. SOP/SMART/MCAR/VIII/TS-PGM dated 15 July 2020, described about weeds control, which covers weeds control in the nursery, immature and immature areas, equipment used for weeds control, safety procedures of control, guideline of agrochemicals uses (include paraquat) and monitoring. • Procedure No. SOP/SMART/MCAR/VII/TA-HPT dated 15 July 2020, described about Pests and Diseases (P&D) Control Management which covers early warning system, census, P&D attack threshold limits, evaluation and decision of pest and disease control, | Complied |

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| | | <p>recommendation from SMARTRI (Research Department), P&D handling, recommendation of P&D control and evaluation.</p> <p>The details of P&D control have presented in several work instruction (WI), for example as follows:</p> <ul style="list-style-type: none"> - WI No. IK/SMART/MCAR/VII/TA-HPT/01 about leaf eating caterpillar detection. - WI No. IK/SMART/MCAR/VII/TA-HPT/02 about leaf eating caterpillar census. - WI No. IK No. IK/SMART/MCAR/VII/TA-HPT/03 about leaf eating caterpillar control. - WI No. IK/SMART/MCAR/VII/TA-HPT/04 about census and management of <i>Oryctes rhinoceros</i>. - WI No. IK/SMART/MCAR/VII/TA-HPT/05 about census and management of termites. - WI No. IK/SMART/MCAR/VII/TA-HPT/07 about census and management of rats. <p>Based on document verification, Belian and Tengkwang Estate have had IPM program for 2024, consist of the following:</p> <ul style="list-style-type: none"> • Pest and disease census: programmed monthly. • Planting and upkeep beneficial plant: programmed monthly. • Animal infestation census: programmed every two months. • Barn owl box census: programmed monthly. <p>Evident of monitoring and control are available under document pest and disease census, planting and upkeep beneficial plant, census of pest infestation and <i>Tyto alba</i> reproduction monitoring. Rat detection is conducted in 3 monthly bases, while leaf eater caterpillar detection is conducted in 2 monthly bases.</p> <p>Sample verified related IPM:</p> | |
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| | | <ul style="list-style-type: none"> - Monitoring of barn-owl box Belian Estate, dated 13 July 2024, 20 August 2024 and 19 September 2024, noted that there is 6 barn-owl boxes in Belian Estate. - Monitoring of barn-owl box Tengkawang Estate, period January to September 2024, noted that there is 5 barn-owl boxes in Tengkawang Estate. - Monitoring upkeep of beneficial plant (<i>Turnera subulatta</i> and <i>Antigonon leptopus</i>), recapitulated in monthly basis. <p>According to above document, noted that monitoring of pest and disease are performed to ensure effective pest and disease control.</p> <p>Based on field observation to chemical weeding activity at Block M59 Division 2 Belian Estate and Block F37 Division 3 Tengkawang Estate, noted that IPM plans are implemented. Beneficial plants such as <i>Turnera subulatta</i> and <i>Antigonon leptopus</i> are planted and upkept to provide host of natural predators of leaf eater caterpillar.</p> | |
| 7.1.2 | <p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p> | <p>Based on document review and field observation, the company implement some biological control practices to suppress pest and diseases infestation such as white buttercup flower (<i>Turnera subulata</i>) and barn owl (<i>Tyto alba</i>). Verification result on website of cabi.org known that those species stated as not invasive in Indonesia.</p> <p>According to evaluation by the company on 31 August 2024, referring to PermenLHK No.94/2016, there are some species that originally grown in the plantation, such as <i>Limnocharis flava</i>, <i>Clidemia hirta</i>, <i>Mimosa pigra</i> and <i>Mimosa pudica</i>. There is no invasive species that being used to manage areas.</p> | Complied |
| 7.1.3 | <p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p> | <p>Based on field visit, document review, and interview to internal and external stakeholders, there is no use of fire for pest control in all operational area. Document observed including "<i>Laporan Pengendalian Kebakaran Hutan dan Lahan PT PIP</i>" – report regarding management of</p> | Complied |

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| | | forest and land fire, period April – June 2024. Report received by Environmental Agency of Kapuas Hulu Regency. | | | | | | | | | | | | | | | | | | | |
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| Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. | | | | | | | | | | | | | | | | | | | | | |
| 7.2.1 | <p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p> | <p>There is no change to the procedure of activities related pesticides. The unit of certification implemented procedures for Pest and Disease Control (SOP/SMART/MCAR/VII/TA-HPT) and Weed Control (SOP/SMART/MCAR/VIII/TA-PGM) that mentioned the use of selective products that are specific to target pests, weeds, or diseases and which have minimal effect on non-target species and measures to avoid the development of resistance has been applied. The company only used pesticides that registered in "Komisi Pestisida Kementrian Pertanian Republik Indonesia".</p> <p>The unit of certification has policy on safe use of chemical including pesticides which stated in GAR Social and Environment Policy, dated 8 September 2015. The organisation has also established Memorandum No: 032/PD/VIII/2016 dated 13 August 2015 signed by President Director Mr. Daud Darsono, that there will be no use of paraquat for weed control.</p> <p>The company has recorded list of herbicides used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.</p> <table><tr><th>Trademark</th><th>Active Ingredient</th><th>WHO Class</th><th>Target</th><th>Registration Number</th><th>Expiry date</th></tr><tr><td>Erkafuron 20 WG</td><td>Metil metsulfuron 20%</td><td>U</td><td>Ferns, Broad Leaf, Sedges</td><td>RI.01030120134861</td><td>04/10/2027</td></tr><tr><td>Roll Up 480 SL</td><td>Isopropilamina glifosat 480 g/l</td><td>III</td><td>Grasses weed</td><td>RI.01030120042133</td><td>05/03/2029</td></tr></table> | Trademark | Active Ingredient | WHO Class | Target | Registration Number | Expiry date | Erkafuron 20 WG | Metil metsulfuron 20% | U | Ferns, Broad Leaf, Sedges | RI.01030120134861 | 04/10/2027 | Roll Up 480 SL | Isopropilamina glifosat 480 g/l | III | Grasses weed | RI.01030120042133 | 05/03/2029 | Complied |
| Trademark | Active Ingredient | WHO Class | Target | Registration Number | Expiry date | | | | | | | | | | | | | | | | |
| Erkafuron 20 WG | Metil metsulfuron 20% | U | Ferns, Broad Leaf, Sedges | RI.01030120134861 | 04/10/2027 | | | | | | | | | | | | | | | | |
| Roll Up 480 SL | Isopropilamina glifosat 480 g/l | III | Grasses weed | RI.01030120042133 | 05/03/2029 | | | | | | | | | | | | | | | | |

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| | | <table><tr><td>Garlon Mix 333/17 EW</td><td>Triklopir butoksi etil ester 333 g/l; Aminopropali d potassium 17 g/l</td><td>II</td><td>Broad leaf weed (<i>Berreria latifolia</i>)</td><td>RI.01030120155148</td><td>31/01/2025</td></tr><tr><td>Starane 480 EC</td><td>Fluroksipir 1 – MHE 480 g/l</td><td>U</td><td>Broad leaf</td><td>RI.01030120083155</td><td>08/02/2028</td></tr></table> | Garlon Mix 333/17 EW | Triklopir butoksi etil ester 333 g/l; Aminopropali d potassium 17 g/l | II | Broad leaf weed (<i>Berreria latifolia</i>) | RI.01030120155148 | 31/01/2025 | Starane 480 EC | Fluroksipir 1 – MHE 480 g/l | U | Broad leaf | RI.01030120083155 | 08/02/2028 | |
| Garlon Mix 333/17 EW | Triklopir butoksi etil ester 333 g/l; Aminopropali d potassium 17 g/l | II | Broad leaf weed (<i>Berreria latifolia</i>) | RI.01030120155148 | 31/01/2025 | | | | | | | | | | |
| Starane 480 EC | Fluroksipir 1 – MHE 480 g/l | U | Broad leaf | RI.01030120083155 | 08/02/2028 | | | | | | | | | | |
| 7.2.2 | <p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p> | <p>The routine pesticides application was for weed control in circle, path and TPH (marketplace) every four months if necessary. The common pesticide used are such as Roll Up 480 SL (a.i Isopropilamina Gyphosate) and Erkaforon (a.i. <i>Metil Metsulfuron</i>). The usage of pesticide are documented in the form of Pesticide Toxicity, that record includes products name, active ingredients, LD50, percentage of active ingredients, total application, total active ingredients, area of application and active ingredients per ha application.</p> <p>For example, for to date 2024, the toxicity calculation of Roll Up 480 SL in Tengawang Estate:</p> <ul style="list-style-type: none">- Volume used 2,436.66 L- Active ingredients usage 731 kg- FFB production 38,044.50 MT- Pesticide unit (toxicity) 0.000000003843 <p>Toxicity calculation of Garlon in Tengawang Estate:</p> <ul style="list-style-type: none">- Volume used 525.47 L- Active ingredients usage 105.09 kg- FFB production 38,044.50 MT- Pesticide unit (toxicity) 0.000000000552 | Complied | | | | | | | | | | | | |

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| | | <p>Toxicity calculation of Roll Up 480 SL in Belian Estate:</p> <ul style="list-style-type: none"> - Volume used 578.77 L - Active ingredients usage 173.63 kg - FFB production 3,306.89 MT - Pesticide unit (toxicity) 0.000026252914 <p>Toxicity calculation of Erkaforon in Belian Estate:</p> <ul style="list-style-type: none"> - Volume used 55.66 kg - Active ingredients usage 11.13 kg - FFB production 3,306.89 MT - Pesticide unit (toxicity) 0.000000673261. | |
| 7.2.3 | <p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - | <p>In line with the explanation of Criteria 7.1 that IPM has been carried out quite effectively, therefore, there was no chemical use for pest control, except for routine weed control. Pesticides were used regularly for weed control in the circle, path and TPH with interval every 4 months or if necessary depend on weed conditions. The usage of pesticides has been monitored in monthly and yearly basis.</p> <p>The use of pesticides is minimized as part of a plan. If the conditions of circle, path and TPH are still clean, the chemical weeding control will be postponed. Based on field observation to chemical spraying activities at Block M59 Division 2 Belian Estate and Block F37 Division 3 Tengawang Estate, noted that the application method was not a preventive application, but rather selective for weedy locations that considered exceed the economic threshold.</p> | Complied |
| 7.2.4 | <p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <ul style="list-style-type: none"> - Minor compliance - | <p>The unit of certification does not use pesticides propylactically. If the conditions of circle, path and TPH are still clean, the chemical weeding control will be postponed. Based on field observation to chemical spraying activities at Block M59 Division 2 Belian Estate and Block F37</p> | Complied |

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| | | Division 3 Tengawang Estate, noted that the application method was not a preventive application, but rather selective for weedy locations that considered exceed the economic threshold. | |
| 7.2.5 | <p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <p>- Minor compliance -</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p> | <p>There is no use of WHO Class 1A or 1B pesticide in whole plantation operation. The use of paraquat has been stopped since 2015. The Group has a policy on safe use of chemical including pesticides which sated in GAR Social and Environment Policy, dated 8 September 2015. The company has also established Memorandum of President Director No. 044/PD/IX/2014 dated 21 November 2014 and No. 032/PD/VIII/2016 dated 13 August 2015 which mentioned that there will be no uses of paraquat starting from 2016.</p> <p>Based on visit in field operation and agrochemical storage in Belian and Tengawang Estate, there was no paraquat found or used. Based on report of pesticide use in 2022 to 2024 – there were no paraquat noted in the report.</p> | Complied |
| | 7.2.5b Why there is no other alternative which can be used. | There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of the company. | |
| | 7.2.5c Which process was applied to verify why there is no other less hazardous alternative. | There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of the company. | |
| | 7.2.5d Process to limit the negative impacts of the application. | There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of the company. | |
| | 7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. | There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of the company. | |

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| 7.2.6 | <p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p> | <p>Pesticides are handled and applied by a trained person. Records of training was sighted and reviewed such as in Belian Estate on 23 August 2024 and 6 - 7 September 2024, and in Tengawang Estate on 18 March 2024.</p> <p>Based on interview with spraying worker at Block M59 Division 2 Belian Estate and Block F37 Division 3 Tengawang Estate, noted that they are all have been trained for pesticide uses and handling, and have long experience in pesticide application (more than 2 years). Pesticide application is conducted using methods that minimize risks and negative impacts on workers and the environment. Workers are trained to demonstrate safe working practices in accordance with established procedures, such as spraying with the wind direction and avoiding application near riparian zones. They also understand emergency response protocols in the event of an accident. Spraying is performed selectively using knapsack sprayers or Controlled Droplet Applicators (CDA), with nozzles calibrated regularly. After use, knapsack sprayers, CDAs, and personal protective equipment (PPE) are stored in a designated storage facility at the estate. Moreover, pesticide solutions are mixed in designated pesticide warehouses and transported using specialized vehicles. Work equipment and personal protective equipment (PPE) are stored in specific warehouses, which are also used for mixing pesticides and washing after work. Rinse solutions are collected and stored in a designated area for reuse as a mixing agent in the following day's activities.</p> | Complied |
| 7.2.7 | <p>(C) Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p> | <p>All pesticides have been stored in a place in accordance with laws and regulations where they are placed on separate shelves that are liquid and powdery, the floor is waterproof, there are banwalls, emergency equipment such as eye wash, first aid boxes and fire extinguishers, adequate air ventilation and MSDS is available for each type of pesticide.</p> | Complied |

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| | | In addition, used pesticide jerry cans have been well managed, namely stored at a licensed hazardous waste temporary warehouse. | |
| 7.2.8 | All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging. - Minor compliance - | Used pesticide containers have been well managed, namely stored at a licensed hazardous waste temporary warehouse. Unit of certification also has a hazardous waste storage that has permits for Miil and Estate. Hazardous waste are handled according to applicable regulation. Permit of hazardous waste temporary storage (TPS LB3) from Regent of Kapuas Hulu dated 30 Jun 2020 by OSS System. Letter of Recommendation by Environmental Office of Kapuas Hulu Regency was available No. 660.34/312/DLH/P2LH-A dated 30 Jun 2020. The used pesticide containers are then sent to a 3rd party that already has a permit to transport and collect hazardous waste. (See indicator 7.3.1 – 7.3.3) | Complied |
| 7.2.9 | (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance - | Based on document verification and interview with Estate Manager and field workers, obtain information that there is no aerial spraying of pesticides in Belian Estate and Tengkawang Estate. | Complied |
| 7.2.10 | (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance - | The company has shown evidence of health checks for pesticide operators of belian estate and tengkawang estate, among others: 1. Cholinesterase level examination of fertilization, spraying, warehouse head, warehouse clerk, fertilizer mador and spray foreman with a total of 40 people on 21 September 2024. 2. Spirometry examination of fertilization workers, sprayers, warehouse heads, warehouse clerks, fertilizer masters and spray foremen with a total of 40 people on 21 September 2024. | Complied |

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| | | <p>3. Cholinesterase level examination of 15 chemical workers at the Mill on 9 April 2024.</p> <p>Based on the results of the examination of blood cholinesterase levels, there are indications that 2 employees are poisoned, so the employees are transferred to jobs that are not related to chemicals.</p> <p>An example of a job mutation certificate that was verified was number: 12/EM-BLNE/09/2024 on 23 September 2024 on behalf of WN with NIK: 17XXXXXX, the original job is a sprayer and is transferred to manual work that does not use chemicals/pesticides.</p> | |
| 7.2.11 | <p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p> | <p>Based on the results of the field visit, there were no workers who were pregnant or breastfeeding, and the workers had learned that work related to chemicals, especially pesticides, was prohibited for pregnant or breastfeeding women.</p> | Complied |
| <p>Note For 7.2.11</p> <p>Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p> | | | |
| <p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p> | | | |
| 7.3.1 | <p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama has Waste Management Procedure (SOP/SMART/LEMS-ESHD/SADV/I/002), and work instruction for used pesticide containers handling (IK/SPO/SMART/LH- 09/01).</p> <p>Hazardous and medical waste are disposed to the licensed collector, whilst domestic waste disposed to the landfill. Available agreement No.071/EPMD/SPK-Pengelolaan LB3/PIP-PJ/2022 dated 21 Mar 2022, between PT Paramitra Internusa Pratama and PT Primanru Jaya as the transporter and processor of hazardous and toxic waste including medical waste.</p> | Complied |

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| | | <p>Organic and inorganic waste is separated in line site. Organic wastes are composted then used as fertilizer for housing plants. Inorganic wastes are sent to the landfill and some of it collected for re-cycle. Landfill location is far enough from the employee housing, around \pm 2 km distance. Audit team has visited landfill of Belian Estate which located at Block H57, landfill condition is good and maintained.</p> <p>Hazardous wastes are handled according to applicable regulation. Permit of hazardous waste temporary storage (TPS LB3) from Regent of Kapuas Hulu dated 30 Jun 2020 by OSS System. Letter of Recommendation by Environmental Office of Kapuas Hulu Regency was available No. 660.34/312/DLH/P2LH-A dated 30 Jun 2020.</p> <p>Sample of reuse and recycle in estates are reusing the fertilizer sack for loose fruit base, which triple rinsed prior to use in the field. Other sample is recycled of 20 L used pesticides container, which triple rinsed, label removed and painted red, used to carry chemical solutions in the field in pesticide application work. Reducing waste and recycling by Belian Palm Oil Mill are performed by reusing by product, such as fibre and shell as fuel of the boiler.</p> | |
| 7.3.2 | <p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p> | <p>In relation to hazardous waste management, the company has demonstrated several things including:</p> <p>The company can show a cooperation agreement with PT Primanru Jaya, which is based on Agreement Number 071/EPMD/SPK-Pengelolaan LB3/PIP-PJ/III/2022 which was made on 21 March 2022 and valid until 24 March 2025.</p> <p>PT Primanru Jaya has obtained several licenses including:</p> <p>- Recommendation for the transportation of hazardous waste (B3 waste) from the Ministry of Environment and Forestry with number: S.328/PSLB3-PLB3/PK/PLB.3/6/2023 on 2 June 2023 for 19 transport units with the type of transportation of hazardous waste with hazard</p> | Complied |

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| | | <p>categories 1 and 2. This recommendation is valid until 19 November 2024.</p> <ul style="list-style-type: none"> - Extension of Hazardous Waste (B3) management permit for Provincial Scale Hazardous Waste collection activities with number: 503/01/IPLB/DPMPTSP-C.I/2020 from the head of the West Kalimantan Province Investment and One-Stop Integrated Service Office on 10 March 2020 and is valid for 5 years. - Permit to Operate Special Freight Transport for Transporting Dangerous Goods (hazardous waste) based on the decision of the Director General of Land Transportation with number: 81200019402150002 on 15 February 2023 and valid until 15 February 2028. <p>PT Primanru Jaya has cooperation agreements with several hazardous waste processors including PT Hidup Makmur Jaya Abadi, PT Kita Mandiri Abadi, PT Solusi Bangunan Indonesia and PT Pengolahan Limbah Industri Bekasi. Based on the results of verification of the documents, the agreements are still valid.</p> <p>The company has shown the Balance Sheet of hazardous waste for 2023 and 2024 until June with details: The types of hazardous waste stored are used oil 2.017 tons, used oil filter 0.018 tons, hazardous waste packaging 0.288 tons, used rags 0.1768 tons, used batteries 0.362 tons, and used lamps 0.005 tons.</p> <p>Record of hazardous waste disposal, in form of manifest:</p> <ul style="list-style-type: none"> - Electronic hazardous waste manifes No. KLHK-1718546408; Used oil; Volume: 6.025 Ton, transporter PT Primanru Jaya on 28 February 2024. - Electronic hazardous waste manifes No. KLHK-1718546033; used rags; Volume: 0.385 Ton, transporter PT Primanru Jaya on 28 February 2024. | |
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| | | <ul style="list-style-type: none"> - Electronic hazardous waste manifes No. KLHK-1718691185; Medical waste; Volume: 0.015 Ton, transporter PT Primanru Jaya on 28 February 2024. - Electronic hazardous waste manifes No. KLHK-1718545775; used lamp; Volume: 0.018 Ton, transporter PT Primanru Jaya on 28 February 2024. - Electronic hazardous waste manifes No. KLHK-178545697; hazardous waste packaging; Volume: 0.212 Ton, transporter PT Primanru Jaya on 28 February 2024. - Electronic hazardous waste manifes No. KLHK-1718545831; Used filter; Volume: 0.106 Ton, transporter PT Primanru Jaya on 28 February 2024. - Electronic hazardous waste manifes No. KLHK-1718546257; Used batteries; Volume: 0.206 Ton, transporter PT Primanru Jaya on 28 February 2024. <p>The company has shown evidence of sending waste reports to the Last report has been submitted to Ministry of Environment and Forestry and Kapuas Hulu Regency Office of Environmental, Plantation and Manpower on a quarterly basis, the last reporting was done on 9 July 2024.</p> <p>Domestic waste from employee housing, the company has managed by providing waste bins in the housing and providing waste pickers from the housing to the final landfill in a location far from the housing.</p> <p>Solid waste from mill by-products in the form of shells and fibers are used as boiler fuel, empty bunch waste is processed in composting and applied to the land, liquid waste is applied to the land with a land application system.</p> | |
| 7.3.3 | The unit of certification does not use open fire for waste disposal. - Minor compliance - | Based on the results of field visits to the worker housing and at other operational locations that were sampled, no traces of open or closed burning of waste were found, besides that the hazardous waste | Complied |

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| | | produced has been collected in the temporary storage of hazardous waste from the Estate and Mill and then handed over to the third party hazardous waste transporters and collectors who have a permit, namely PT Primanru Jaya. | |
| 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 | <p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p> | <p>The unit of certification has established procedures for good agricultural practices aimed at maintaining soil fertility and minimizing environmental impact, as outlined in SOP/SMART/MCAR/IX/TA-PPK (Fertilizing). Fertilizers are applied to maintain and enhance soil fertility, following recommendations based on soil and leaf analyses.</p> <p>These procedures include a range of strategies designed to sustain and improve long-term fertility through efficient and measurable inorganic fertilization, taking into account the age of the oil palms and the nutrient properties of the soil, as determined by regular leaf and soil sampling.</p> <p>Efficient and non-excessive inorganic fertilization is critical for maintaining soil structure and texture. This is complemented by the application of manure from Palm Oil Mill Effluent (POME) and Empty Fruit Bunch (EFB) mulching. Manuring is especially important in areas with low nutrient properties, as it improves soil structure, texture, and microbiological properties while minimizing the need for inorganic fertilizers whenever possible. Although there are currently no replanting activities, the procedures stipulate that biomass from future replanting will be returned to the soil to support nutrient cycling strategies.</p> <p>During this ASA 1, there are no fertilizer application activities taking place because there is no rain for two weeks. Based on interviews, fertilizer applications are conducted according to standard operating procedures (SOPs) that adhere to best agricultural practices and aim to minimize environmental impacts. Applications utilize the correct type, target, and dosage of fertilizer, and care is taken to avoid applying near drainage areas.</p> | Complied |

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| 7.4.2 | <p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> <p>- Minor compliance -</p> | <p>The Soil Sampling Unit (SSU) and Leaf Sampling Unit (LSU) are conducted regularly. According to SOP of Manuring (SOP/SMART/MCAR/IX/TA-PPK, dated 15 July 2020).</p> <p>The latest LSU conducted based on report No.0329/DAUN/LAB-SMARTRI/V/2024, dated 18 May 2024. Report contain analysis of 62 sample (Lab No.2401730-24016791) from BLNE, BLNA, KHLE, KHLA, SBRE and TNKE. Analysis result consist of N, P, K, Mg, Ca, B, Cu, Zn, Mn, Fe, and Cl, using method SMARTRI-IK-05 No.01-08.</p> <p>The latest SSU conducted based on report No.013/TANAH/LAB-SMARTRI/II/2024, dated 29 February 2024. Report contain analysis of 48 sample (Lab No.1096-1143) from BLNE. Analysis result consist of texture, pH, N, C-Organic, P2O5N, CEC, Base Exchangeable, A1 and H.</p> | Complied |
| 7.4.3 | <p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p> | <p>The company implements efficient and non-excessive inorganic fertilization to maintain soil structure and texture, complemented by manure application from palm oil mill effluent (POME) and empty fruit bunch (EFB) mulching. Manuring is especially conducted in areas with low nutrient properties to enhance soil structure and texture while minimizing the use of inorganic fertilizers whenever possible.</p> <p>Currently, there are no replanting activities underway; however, the established procedure mentioned that biomass from replanting will be returned to the soil as part of a nutrient cycling strategy.</p> <p>Based on document reviews and field observations, EFB mulching has been implemented across all estates, particularly in sandy areas, at application rates of 40 tons/ha/year and 30 tons/ha/year. For 2024, the planned application of 40 tons/ha/year is 9,569.87 tons, with an actual application up to August 2024 of 2,027.375 tons. For the 30 tons/ha/year plan, 6,241.50 tons is scheduled, with an actual application of 2,141.68 tons. Meanwhile, POME land application has only been conducted in Belian Estate, with an expected application rate of 250 tons/ha per round, scheduled for three rounds a year.</p> | Complied |

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| | | <p>The POME utilization permit is based on the Kapuas Hulu Regent's Decree No. 587 of 2018 regarding the use of POME for land application in the oil palm plantations of PT Paramitra Internusa Pratama in Semitau District, Kapuas Hulu Regency, dated 24 September 2018. This permit stipulates that the biochemical oxygen demand (BOD) must not exceed 5000 mg/liter, and the pH must be maintained between 6 and 9. Additionally, the Letter of Direction for Environmental Approval Change from the Kapuas Hulu Office of Public Housing and Settlement, Agriculture, and Environment, No. 660/47/DPPLH/TL dated 13 June 2022, includes the approval of the technical details of hazardous waste and the technical standards/studies for the utilization of POME for land application.</p> <p>Actual POME application for January-August 2024 is as follows:</p> <ul style="list-style-type: none">• Belian Estate: 305.62 hectares; 38,202.50 m³• Tengawang Estate: 1,061.42 hectares; 132,677.25 m³. | | | | | | | |
|-----------------|--|---|-----------------|----------------------|--------------|------|--------|--------|----------|
| 7.4.4 | Records of fertilizer inputs are maintained. - Minor compliance - | <p>The records of fertilizer input has been well documented in every Estate for each block. In 2024, the fertilizer application including Urea, RP, TSP, SP-36, MOP, Dolomite, Kieserite, Kaptan, Borate, CuSO₄, and ZnSO₄. Overall, total recommendation for BLNE 1st Semester of 2024 is 1,046.46 MT, while the actual application is 879.97 MT. The company has justified that the lack of fertilization is due to efficiency, and lack of rainfall. Total recommendation for TKNE 1st Semester of 2024 is 1,831.68 MT, while the actual application is 957.15 MT. The company has justified that the lack of fertilization is due to efficiency, and lack of rainfall.</p> <p>Below is example of fertilizer input in BLNE for 1st Semester of 2024:</p> <table><tr><th>Fertilizer Type</th><th>Recommendation (ton)</th><th>Actual (ton)</th></tr><tr><td>Urea</td><td>241.50</td><td>223.85</td></tr></table> | Fertilizer Type | Recommendation (ton) | Actual (ton) | Urea | 241.50 | 223.85 | Complied |
| Fertilizer Type | Recommendation (ton) | Actual (ton) | | | | | | | |
| Urea | 241.50 | 223.85 | | | | | | | |

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| | | RP | 186.60 | 137.65 | | |
| | | TSP | 9.40 | 9.40 | | |
| | | SP-36 | 6.85 | 3.35 | | |
| | | MOP | 342.25 | 329.80 | | |
| | | S. Dolomite | 13.30 | 13.30 | | |
| | | Kieserite Powder | 1.30 | 0.50 | | |
| | | Kieserite Granular | 194.80 | 123.00 | | |
| | | Kaptan | 18.90 | 9.05 | | |
| | | HGFB | 17.33 | 16.81 | | |
| | | CuSO ₄ | 8.97 | 8.26 | | |
| | | ZnSO ₄ | 5.27 | 5.00 | | |
| | | Total | 1,046.46 | 879.97 | | |
| | | Below is example of fertilizer input in TKNE for 1 st Semester of 2024: | | | | |
| | | Fertilizer Type | Recommendation (ton) | Actual (ton) | | |
| | | Urea | 580.80 | 369.90 | | |
| | | RP | 338.05 | 193.45 | | |
| | | TSP | 9.10 | 18.60 | | |
| | | SP-36 | 2.05 | 0 | | |
| | | MOP | 536.05 | 326.90 | | |
| | | S. Dolomite | 20.05 | 25.75 | | |

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| | | <table><tr><td>Kieserite Powder</td><td>7.20</td><td>0</td></tr><tr><td>Kieserite Granular</td><td>286.60</td><td>111.80</td></tr><tr><td>Kaptan</td><td>0</td><td>0</td></tr><tr><td>HGFB</td><td>31.18</td><td>22.55</td></tr><tr><td>CuSO₄</td><td>18.09</td><td>2.90</td></tr><tr><td>ZnSO₄</td><td>0.67</td><td>0</td></tr><tr><td>Total</td><td>1,831.68</td><td>957.15</td></tr></table> | Kieserite Powder | 7.20 | 0 | Kieserite Granular | 286.60 | 111.80 | Kaptan | 0 | 0 | HGFB | 31.18 | 22.55 | CuSO ₄ | 18.09 | 2.90 | ZnSO ₄ | 0.67 | 0 | Total | 1,831.68 | 957.15 | | | | | | | | |
|--|---|---|------------------|----------|------------------|--------------------|------------------|--------|--------|---|----|------|---------------|----------|-------------------|-------|--------|-------------------|-------------------|----------|--------|----------|----------|-------|-------|----------|--------|-------|----------|-------|----------|
| Kieserite Powder | 7.20 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kieserite Granular | 286.60 | 111.80 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kaptan | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HGFB | 31.18 | 22.55 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CuSO ₄ | 18.09 | 2.90 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ZnSO ₄ | 0.67 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 1,831.68 | 957.15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criteria 7.5: Practices minimise and control erosion and degradation of soils. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.5.1 | <p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p> | <p>The latest Semi-detail Soil Survey has been conducted by the company in 2023, to identify soil type, slope, texture, solum depth, peat, drainage, topography and land suitability class. Soil type of PT PIP consist of: <i>Aquic Dystrudepts, Typic Dystrudepts, Typic Hapludults, Aquic Udipsamments, Typic Udipsamments, Typic Haplosaprists, and Typic Endoaquepts</i>. Slope is ranged from 0° to 12°.</p> <p>GAR has submitted the Peat Inventory for PT Paramitra Internusa Pratama – Belian Mill and supply bases on 5 November 2023. Total peat in Belian and Tengawang Estate as follows:</p> <table><tr><th rowspan="2">Estate</th><th rowspan="2">Peat</th><th colspan="2">Planted Peat</th><th colspan="2">Not Planted Peat</th></tr><tr><th>Ha</th><th>%</th><th>Ha</th><th>%</th></tr><tr><td>Belian Estate</td><td>1,587.46</td><td>744.22</td><td>46.88</td><td>843.24</td><td>53.12</td></tr><tr><td>Tengkawang Estate</td><td>1,658.53</td><td>139.89</td><td>8.43</td><td>1,518.64</td><td>91.57</td></tr><tr><td>Total</td><td>3,245.99</td><td>884.11</td><td>27.24</td><td>2,362.88</td><td>72.76</td></tr></table> | Estate | Peat | Planted Peat | | Not Planted Peat | | Ha | % | Ha | % | Belian Estate | 1,587.46 | 744.22 | 46.88 | 843.24 | 53.12 | Tengkawang Estate | 1,658.53 | 139.89 | 8.43 | 1,518.64 | 91.57 | Total | 3,245.99 | 884.11 | 27.24 | 2,362.88 | 72.76 | Complied |
| Estate | Peat | Planted Peat | | | Not Planted Peat | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Ha | % | Ha | % | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Belian Estate | 1,587.46 | 744.22 | 46.88 | 843.24 | 53.12 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tengkawang Estate | 1,658.53 | 139.89 | 8.43 | 1,518.64 | 91.57 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 3,245.99 | 884.11 | 27.24 | 2,362.88 | 72.76 | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| 7.5.2 | The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance - | Based on the Area Statement, it is noted that the planting took place between 2008 and 2014, making the oldest plants 14 years old. Therefore, replanting will not occur in the next five years. Additionally, according to the company’s procedures, replanting will not be conducted in areas with slopes greater than 40%. | Complied | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|----------|----------|------------------|--|------------------|--|----|---|----|---|---------------|----------|--------|-------|--------|-------|-------------------|----------|--------|------|----------|-------|----------|
| 7.5.3 | New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance - | Based on soil map resulted from Semi-detail Soil Survey 2023, there is no area in PT Paramitra Internusa Pratama that have more than 40% steep. There is no planting in steep area. | Complied | | | | | | | | | | | | | | | | | | | | | | |
| Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations. | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.6.1 | (C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations. - Critical (Major) compliance - | <p>The latest Semi-detail Soil Survey has been conducted by the company in 2023, to identify soil type, slope, texture, solum depth, peat, drainage, topography and land suitability class. Soil type of PT PIP consist of: <i>Aquic Dystrudepts, Typic Dystrudepts, Typic Hapludults, Aquic Udipsamments, Typic Udipsamments, Typic Haplosaprists, and Typic Endoaquepts</i>. Slope is ranged from 0° to 12°.</p> <p>GAR has submitted the Peat Inventory for PT Paramitra Internusa Pratama – Belian Mill and supply bases on 5 November 2023. Total peat in Belian and Tengkwang Estate as follows:</p> <table><tr><th rowspan="2">Estate</th><th rowspan="2">Peat</th><th colspan="2">Planted Peat</th><th colspan="2">Not Planted Peat</th></tr><tr><th>Ha</th><th>%</th><th>Ha</th><th>%</th></tr><tr><td>Belian Estate</td><td>1,587.46</td><td>744.22</td><td>46.88</td><td>843.24</td><td>53.12</td></tr><tr><td>Tengkawang Estate</td><td>1,658.53</td><td>139.89</td><td>8.43</td><td>1,518.64</td><td>91.57</td></tr></table> | Estate | Peat | Planted Peat | | Not Planted Peat | | Ha | % | Ha | % | Belian Estate | 1,587.46 | 744.22 | 46.88 | 843.24 | 53.12 | Tengkawang Estate | 1,658.53 | 139.89 | 8.43 | 1,518.64 | 91.57 | Complied |
| Estate | Peat | Planted Peat | | | Not Planted Peat | | | | | | | | | | | | | | | | | | | | |
| | | Ha | % | Ha | % | | | | | | | | | | | | | | | | | | | | |
| Belian Estate | 1,587.46 | 744.22 | 46.88 | 843.24 | 53.12 | | | | | | | | | | | | | | | | | | | | |
| Tengkawang Estate | 1,658.53 | 139.89 | 8.43 | 1,518.64 | 91.57 | | | | | | | | | | | | | | | | | | | | |

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| | | <table><tr><td>Total</td><td>3,245.99</td><td>884.11</td><td>27.24</td><td>2,362.88</td><td>72.76</td></tr></table> | Total | 3,245.99 | 884.11 | 27.24 | 2,362.88 | 72.76 | | | | | | | | | | | | | | | | | | | | | | | |
|-------------------|--|---|----------|----------|------------------|-------|------------------|-------|----|---|----|---|---------------|----------|--------|-------|--------|-------|-------------------|----------|--------|------|----------|-------|-------|----------|--------|-------|----------|-------|----------|
| Total | 3,245.99 | 884.11 | 27.24 | 2,362.88 | 72.76 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.6.2 | Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance - | <p>The latest Semi-detail Soil Survey has been conducted by the company in 2023, to identify soil type, slope, texture, solum depth, peat, drainage, topography and land suitability class. Soil type of PT PIP consist of: <i>Aquic Dystrudepts, Typic Dystrudepts, Typic Hapludults, Aquic Udipsamments, Typic Udipsamments, Typic Haplosaprists, and Typic Endoaquepts</i>. Slope is ranged from 0° to 12°.</p> <p>GAR has submitted the Peat Inventory for PT Paramitra Internusa Pratama – Belian Mill and supply bases on 5 November 2023. Total peat in Belian and Tengawang Estate as follows:</p> <table><tr><th rowspan="2">Estate</th><th rowspan="2">Peat</th><th colspan="2">Planted Peat</th><th colspan="2">Not Planted Peat</th></tr><tr><th>Ha</th><th>%</th><th>Ha</th><th>%</th></tr><tr><td>Belian Estate</td><td>1,587.46</td><td>744.22</td><td>46.88</td><td>843.24</td><td>53.12</td></tr><tr><td>Tengkawang Estate</td><td>1,658.53</td><td>139.89</td><td>8.43</td><td>1,518.64</td><td>91.57</td></tr><tr><td>Total</td><td>3,245.99</td><td>884.11</td><td>27.24</td><td>2,362.88</td><td>72.76</td></tr></table> | Estate | Peat | Planted Peat | | Not Planted Peat | | Ha | % | Ha | % | Belian Estate | 1,587.46 | 744.22 | 46.88 | 843.24 | 53.12 | Tengkawang Estate | 1,658.53 | 139.89 | 8.43 | 1,518.64 | 91.57 | Total | 3,245.99 | 884.11 | 27.24 | 2,362.88 | 72.76 | Complied |
| Estate | Peat | Planted Peat | | | Not Planted Peat | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Ha | % | Ha | % | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Belian Estate | 1,587.46 | 744.22 | 46.88 | 843.24 | 53.12 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tengkawang Estate | 1,658.53 | 139.89 | 8.43 | 1,518.64 | 91.57 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 3,245.99 | 884.11 | 27.24 | 2,362.88 | 72.76 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.6.3 | Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance - | <p>The latest Semi-detail Soil Survey has been conducted by the company in 2023, to identify soil type, slope, texture, solum depth, peat, drainage, topography and land suitability class. Soil type of PT PIP consist of: <i>Aquic Dystrudepts, Typic Dystrudepts, Typic Hapludults, Aquic Udipsamments, Typic Udipsamments, Typic Haplosaprists, and Typic Endoaquepts</i>. Slope is ranged from 0° to 12°. That information has been taken into consideration for planning drainage and irrigation systems, roads and other infrastructure.</p> | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|------------------|--------------------|------------------------|------|--------|-------|------|--------|------|------|------|-------|------|-------|---|------|-------|-------|------|------|------|------|--------|---|--------------|---------------|---------------|----------|
| 7.7.1 | <p>(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.</p> <p>- Critical (Major) compliance -</p> | <p>Based on the Semi-detail Soil Survey Assessment and Soil Map, there is peat in the unit of certification area. Total peat in Belian and Tengkwang Estate is 1,145.31 ha, of which 884.10 ha of it has been planted during year of 2008 – 2014. The rest are kept as non-planted area and managed as conservation area. The planting on peat was covered in the NPP published on the RSPO website.</p> <p>Detailed year of planting on peat are as follow:</p> <table><tr><th>Year of planting</th><th>Belian Estate (Ha)</th><th>Tengkawang Estate (Ha)</th></tr><tr><td>2008</td><td>203.88</td><td>42.49</td></tr><tr><td>2009</td><td>312.49</td><td>4.91</td></tr><tr><td>2010</td><td>5.14</td><td>80.43</td></tr><tr><td>2011</td><td>40.14</td><td>-</td></tr><tr><td>2012</td><td>18.36</td><td>10.34</td></tr><tr><td>2013</td><td>7.44</td><td>1.71</td></tr><tr><td>2014</td><td>156.77</td><td>-</td></tr><tr><td>Total</td><td>744.22</td><td>139.88</td></tr></table> | Year of planting | Belian Estate (Ha) | Tengkawang Estate (Ha) | 2008 | 203.88 | 42.49 | 2009 | 312.49 | 4.91 | 2010 | 5.14 | 80.43 | 2011 | 40.14 | - | 2012 | 18.36 | 10.34 | 2013 | 7.44 | 1.71 | 2014 | 156.77 | - | Total | 744.22 | 139.88 | Complied |
| Year of planting | Belian Estate (Ha) | Tengkawang Estate (Ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2008 | 203.88 | 42.49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2009 | 312.49 | 4.91 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2010 | 5.14 | 80.43 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2011 | 40.14 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2012 | 18.36 | 10.34 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2013 | 7.44 | 1.71 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2014 | 156.77 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 744.22 | 139.88 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.7.2 | <p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p> <p>- Minor compliance -</p> | <p>Peat area within Belian and Tengkwang Estate has been managed, inventoried, documented and reported to the RSPO Secretariat firstly in November 2015, then second submission conducted on 5 November 2023.</p> | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| 7.7.3 | (C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance - | <p>Peatland subsidence in the operational area has been monitored through the installation of peat subsidence stakes, which are regularly observed and documented. Measurements of subsidence in the peat soil are taken on a quarterly basis.</p> <p>According to national regulations, peat soil is considered damaged if the cumulative decrease in surface level exceeds 35 cm over a five-year period. Field observations have been conducted at subsidence stakes No. 03 in Block O67 and No. 06 in Block N59 to verify peat subsidence and assess the understanding of the Person in Charge (PIC). Records indicate that the overall annual subsidence is approximately below 2 cm per year, which remains below the regulatory threshold.</p> | Complied |
| 7.7.4 | (C) Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance - | <p>The water management and land cover system are outlined in the Standard Operating Procedures (SOP) for Peat Management, which includes guidelines for measuring and monitoring water levels, silt pits, and implementing flood mitigation strategies. Field observations have been conducted to verify the implementation of features such as weirs, water level meters in drains, and piezometers to measure the water table.</p> <p>The company operates 11 groundwater level meters, of which 2 are automatic (data loggers). Monitoring data indicates that the water level ranges between 30 and 40 cm. During this assessment, field observations were conducted using a manual piezometer in Block O67 and an electronic piezometer (logger) in Block N59.</p> <p>The land cover management program is managed by the SOP for Spraying and the company's policy on reducing pesticide use, which includes practices such as selective weeding and targeted spraying.</p> | Complied |
| 7.7.5 | (C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before | <p>Based on the Area Statement has known that the year of planting were in the period of 2008 – 2014 (16 years oldest). The replanting will not</p> | Complied |

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| | | | |
|--|---|--|----------|
| | <p>replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p> | <p>be conducted for the next five years. Therefore, the drainability assessment has not been conducted yet.</p> | |
| <p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p> | | | |
| 7.7.6 | <p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p> <p>- Critical (Major) compliance -</p> | <p>Based on document review and field observation, can be concluded that the existing peatland has been managed according to applicable national regulations and RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands, such as by water and ground cover management, and peat subsidence monitoring.</p> <p>The Company has 23 stop blocks, 11 subsidence stakes, and 11 piezometers (9 manual and 2 loggers).</p> <p>The company has been monitoring 9 piezometers every week with the last monitoring data in June 2024 with average results still in accordance with the threshold (40-60 cm below ground level). 2 automatic piezometers (loggers) automatically send data to the MoEF data center.</p> <p>For subsidence measurements carried out every month, the installation of subsidence stakes was carried out for the first time on 3 January 2020</p> | Complied |

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| | | and during the measurement until the last measurement in August 2024 there was still no subsidence decrease (0 cm). | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--|--------|--------|------------------|--|------------------|--|----|---|----|---|---------------|----------|--------|-------|--------|-------|-------------------|--------|--------|-------|-------|-------|-------|----------|--------|-------|--------|-------|----------|
| 7.7.7 | <p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p> <p>- Critical (Major) compliance -</p> | <p>The soil survey assessment has been conducted as a part of plant in plantation development. For peat as marginal area, some have been managed and the other that cannot be planted have been managed as conservation area.</p> <p>The hectarage of peat area as follows:</p> <table><tr><th rowspan="2">Estate</th><th rowspan="2">Peat</th><th colspan="2">Planted Peat</th><th colspan="2">Not Planted Peat</th></tr><tr><th>ha</th><th>%</th><th>ha</th><th>%</th></tr><tr><td>Belian Estate</td><td>1,000.44</td><td>763.03</td><td>76.27</td><td>237.41</td><td>23.73</td></tr><tr><td>Tengkawang Estate</td><td>141.12</td><td>117.35</td><td>83.16</td><td>23.77</td><td>16.84</td></tr><tr><td>Total</td><td>1,141.56</td><td>880.38</td><td>77.12</td><td>261.18</td><td>22.88</td></tr></table> | Estate | Peat | Planted Peat | | Not Planted Peat | | ha | % | ha | % | Belian Estate | 1,000.44 | 763.03 | 76.27 | 237.41 | 23.73 | Tengkawang Estate | 141.12 | 117.35 | 83.16 | 23.77 | 16.84 | Total | 1,141.56 | 880.38 | 77.12 | 261.18 | 22.88 | Complied |
| Estate | Peat | Planted Peat | | | Not Planted Peat | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | ha | % | ha | % | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Belian Estate | 1,000.44 | 763.03 | 76.27 | 237.41 | 23.73 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tengkawang Estate | 141.12 | 117.35 | 83.16 | 23.77 | 16.84 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 1,141.56 | 880.38 | 77.12 | 261.18 | 22.88 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criteria 7.8: Practices maintain the quality and availability of surface and groundwater. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| No | Category of River | Cross Section | Outside the Settlement | | Inside at the Settlement | | Articles |
|----|--|---|--------------------------------------|-----------------------|--------------------------|-----------------------|----------------|
| | | | Criteria | Minimum Riparian Zone | Criteria | Minimum Riparian Zone | |
| 1 | Levee |  | – | 5 m | – | 3 m | Article 6 |
| 2 | Rivers with no dike (from river bank) |  | Big River River Basin > 500 km2 | 100 m | Depth : > 20 m | 30 m | Articles 7 & 8 |
| | | | | | Depth : 3 m to 20 m | 15 m | Articles 7 & 8 |
| | | | Small River River Basin < 500 km2 | 50 m | Depth : 0 m to 3 m | 10 m | Articles 7 & 8 |
| 3 | Lake / Reservoir | | – | 50 m | – | 50 m | Article 10 |
| 4 | Water Springs | | – | 200 m | – | 200 m | Article 10 |
| 5 | Rivers affected by tides (from river bank) | | – | 100 m | – | 100 m | Article 10 |

| | | | |
|-------|--|--|----------|
| 7.8.1 | <p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <ul style="list-style-type: none"> - Minor compliance - <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p> | <p>Unit of Certification establish water management plan in form of "Program Efisiensi Penggunaan Air PT Paramitra Internusa Pratama Tahun 2024". The program for Estate unit consists of:</p> <ol style="list-style-type: none"> Saving water from optimizing the use of pesticides. Description: reuse of rinsed water used for pesticide packaging for spraying activities. Timeline: routine (during the spray activity). Objective: Save water usage for spraying. Water savings in housing and public facilities. Description: using water used for ablution to flush roads and plants. Timeline: routine. Objective: employees and residents of housing. Socialization of water use savings for domestic needs. Description: socializing water use savings to all employees, placing warnings. Timeline: as needed. Objective: improvement of water-saving behavior. Monitoring water use. Description: water use monitoring (m3). Timeline: routine (recap every month). Objective: actual use of water as needed. | Complied |
|-------|--|--|----------|

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|-------|--|---|----------|
| | | <p>Water management program for Mill, consists of:</p> <ol style="list-style-type: none"> 1. Recycle. Program: reuse of air condensate sterilizer for dilution 10% to FFB. 2. Reuse. Program: reuse of turbine cooling water to Raw Water for use as washing water. Evaluation: used turbine water is reused as washing water to minimize domestic water use. | |
| | 7.8.1b Workers have adequate access to clean water. | Based on visit to employees housing complex at Division 2 Belian Estate and Division 1 Tengawang Estate, water source for bathing and washing are using ground water. Clean water for drinking and cooking provided by the company to housing complex from Mill's water treatment or water treatment located in Estate's housing complex. Based on interview with Labor Union and housing resident, it is said that there is no issue related clean water facility. | |
| 7.8.2 | <p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p>- Critical (Major) compliance -</p> | <p>Watercourses which available in unit of certification is stream and reservoir for Mill. Maintaining riparian areas is by planting with local woody species. Maintaining progress are documented within "<i>Rencana dan Rehabilitasi KBKT</i>".</p> <p>Auditor team conducting onsite visit to buffer zones at Sungai Jentu. Actual condition of buffer zones is covered by natural vegetations and young forest/shrubs.</p> <p>The management of riparian areas which implemented by unit of certification is already following RSPO Manual on BMPs for the management and rehabilitation of riparian reserves (April 2017).</p> | Complied |
| 7.8.3 | <p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p> | Permit of POME (Palm Oil Mill Effluent) Application is based on Kapuas Hulu Regent Decree No. 587 Tahun 2018 dated 24 Sep 2018, regarding " <i>Izin Pemanfaatan Air Limbah ke Tanah untuk Aplikasi pada Tanah di Perkebunan Kelapa Sawit PT Paramitra Internusa Pratama Kecamatan Semitau Kabupaten Kapuas Hulu</i> ". Permit valid for 5 years. Term and | Complied |

| | <p>conditions are BOD can not exceed 5000 mg/ltr and pH ranged at 6-9. Application area covers 832 Ha.</p> <p>POME from Belian Mill was processed through a series of waste-water treatment ponds: four anaerobic ponds. POME is monitored monthly as required by permit. The results of POME monitoring were reviewed including measurement of BOD, COD, pH, N Total, TSS, oil and fat for period January – August 2024.</p> <p>The Environment Ministry Decree No. 28/2003 requires that BOD of POME is less than 5,000 mg/liter, pH 6 – 9. The result of POME quality during this period was under 5,000 mg/liter for BOD and pH 7 to 8. Quality of wastewater effluent is monitored monthly by third party, IDSurvey was accredited by KAN (LP-124-IDN).</p> <p>Quality monitoring of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) conducted by independent lab Sucofindo. Quality standard for BOD is maximum 5,000 mg/liter, period Jan – Aug 2024, are as follows:</p> <table><tr><th>Month</th><th>BOD (mg/liter)</th><th>pH</th></tr><tr><td>Jan-24</td><td>3,192</td><td>8.0</td></tr><tr><td>Feb-24</td><td>4,173</td><td>7.8</td></tr><tr><td>Mar-24</td><td>2,662</td><td>8.0</td></tr><tr><td>Apr-24</td><td>2,342</td><td>8.0</td></tr><tr><td>May-24</td><td>4,997</td><td>8.0</td></tr><tr><td>Jun-24</td><td>4,570</td><td>7.3</td></tr><tr><td>Jul-24</td><td>1,391</td><td>7.9</td></tr><tr><td>Aug-24</td><td>4,156</td><td>8.0</td></tr></table> | Month | BOD (mg/liter) | pH | Jan-24 | 3,192 | 8.0 | Feb-24 | 4,173 | 7.8 | Mar-24 | 2,662 | 8.0 | Apr-24 | 2,342 | 8.0 | May-24 | 4,997 | 8.0 | Jun-24 | 4,570 | 7.3 | Jul-24 | 1,391 | 7.9 | Aug-24 | 4,156 | 8.0 | |
|--------|--|-------|----------------|----|--------|-------|-----|--------|-------|-----|--------|-------|-----|--------|-------|-----|--------|-------|-----|--------|-------|-----|--------|-------|-----|--------|-------|-----|--|
| Month | BOD (mg/liter) | pH | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan-24 | 3,192 | 8.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb-24 | 4,173 | 7.8 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar-24 | 2,662 | 8.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr-24 | 2,342 | 8.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May-24 | 4,997 | 8.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun-24 | 4,570 | 7.3 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul-24 | 1,391 | 7.9 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug-24 | 4,156 | 8.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>Based on above monitoring result table, BOD and pH value has been complied with the regulation.</p> <p>The company has shown evidence of testing the water quality of three Land Application monitoring wells (monitoring well 1 block L-53, monitoring well 2 block J-55, monitoring well 3 block J-56 and housing monitoring well (cottage 2). Testing is carried out every 6 months, the last test was carried out on 8 March 2024 by a third-party PT Unilab Perdana which has been accredited (LP-195-IDN) with the results of all test parameters still meeting the quality standards specified in the regulations.</p> <p>The company has shown evidence of testing of LA soil including soil in rorak, soil between rorak and control soil carried out by a third-party testing laboratory PT Mutuagung Lestari which has been accredited by KAN with the number LP-001-IDN which was carried out last on 16-29 April 2024.</p> | | | | | | | | | |
|--------|---|--|---|---------------------|-------------------------------|---|--------|-----------|-----------|------|----------|
| 7.8.4 | <p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p> | <p>Raw water was utilized for mill operations (include boilers, processes, and domestics usage) that through the water treatment plant (using physicals and chemicals method) and for estate operations (include housing, pesticides mixings and office operations).</p> <p>Flow meters were installed to monitor water usage for mill process per ton FFB. The monitoring of water volume utilization was conducted in document "<i>Rekapitulasi Pemakaian dan Distribusi Air tahun 2024</i>" while budget of water consumption sighted in document namely Water Supply Running Account 2024.</p> <table border="1"> <thead> <tr> <th>Month</th><th>FFB Processed (ton)</th><th>Water usage (m³)</th><th>Mill water use per tonne of FFB (m³/ton FFB)</th></tr> </thead> <tbody> <tr> <td>Jan-24</td><td>28,142.85</td><td>33,828.77</td><td>1.42</td></tr> </tbody> </table> | Month | FFB Processed (ton) | Water usage (m ³) | Mill water use per tonne of FFB (m ³ /ton FFB) | Jan-24 | 28,142.85 | 33,828.77 | 1.42 | Complied |
| Month | FFB Processed (ton) | Water usage (m ³) | Mill water use per tonne of FFB (m ³ /ton FFB) | | | | | | | | |
| Jan-24 | 28,142.85 | 33,828.77 | 1.42 | | | | | | | | |

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| | | | | |
|--|--|-------------------|-------------------|-------------|
| | Feb-24 | 27,474.85 | 38,405.03 | 1.40 |
| | Mar-24 | 24,415.64 | 34,704.42 | 1.42 |
| | Apr-24 | 25,965.14 | 40,031.35 | 1.54 |
| | May-24 | 25,037.50 | 34,312.90 | 1.37 |
| | Jun-24 | 25,660.92 | 32,622.40 | 1.27 |
| | Jul-24 | 27,526.76 | 37,136.70 | 1.35 |
| | Aug-24 | 29,964.32 | 45,396.00 | 1.52 |
| | Total | 214,187.98 | 302,501.57 | 1.41 |
| | In addition, the company has a surface water exploitation permit based on the Decree of the Menteri Pekerjaan Umum dan Perumahan Rakyat number: 286.6/KPTS/M/2023 concerning Pemberian Izin Pengusahaan Sumber Daya Air Kepada Perserioan Terbatas Paramitra Internusa Pratanma di Sungai Kapuas, Kabupaten Kapuas Hulu, Provinsi Kalimantan Barat untuk Usaha Industri Kelapa Sawit dan Domestik on February 16, 2023 with the maximum water discharge allowed to be cultivated is 58,752 M3. | | | |
| | Thus, based on the data of average monthly water usage for palm oil processing above, the exploitation of water discharge is still below the maximum discharge allowed to be cultivated. | | | |
| The company has also made regular monthly payments of water exploitation levies, the last payment was made on 28 August 2024 with payment number 47002420001713S transferred through the Bank Pembangunan Daerah Kalbar. | | | | |

Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised

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| 7.9.1 | Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance - | Unit of certification has prepared program for improving efficiency of fossil fuels uses and to optimize renewable energy. Fossil fuel records and trends are maintained and available during audit. Energy use are recorded include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis. The company has also shown data on the use of shell and fiber for boiler fuel during 2024 (up to August 2024), where the total use of shell is 3,623.71-ton and the use of fibre is 26,773.49-ton. The use of shell and fibre has saved 1,071,415 liters of fossil fuel. | Complied |
| Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions. | | | |
| 7.10.1 | (C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly. - Critical (Major) compliance - | The source of greenhouse gas emission has been identified on Environmental aspect and impact identification, updated on 24 January 2024 for mill and estates, as listed below: <ul style="list-style-type: none"> - Boiler stack emission including particulate and soot. - Diesel electric generator emission - POME methane emission - Use of fertiliser - Vehicle and heave equipment emission Several efforts to reduce GHG emissions are prepared as follows: <ul style="list-style-type: none"> - Substitution of fossil fuel with renewable energy (fibre & shell) - Conducted monitoring of diesel uses for operational activity of estate and mill - Dissemination regarding turn off engine of truck during queue entering the mill | Complied |

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| | | <ul style="list-style-type: none"> - Monitoring KWh per tons product coming from renewable and non-renewable energy, trend summarized for 3 months period - Conducted water saving in mill operation, estate and domestic uses - Conducted water use monitoring - Conducted electricity saving in mill operation, estate and domestic uses - Uses energy saving lamp. <p>The source of pollution, type of pollution and its control are documented in list of environmental aspect and impact evaluation. Implementation records of each programme were sighted. The program was including objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure target was achieved.</p> <p>Belian Mill wastewater was processed through a series of wastewater treatment ponds four anaerobic ponds and also used as biogas plant. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements of Kepmen LH 29/2003. The results of monitoring of wastewater effluent were reviewed including measurement of BOD, COD, oil and fat, N total result of discharge effluent conforms to the limits for parameters. Quality of wastewater effluent is monitored monthly by third party, Sucofindo Laboratory.</p> <p>POME Application based on Kapuas Hulu Regent Decree No. 587 Tahun 2018 dated 24 Sep 2018, regarding "Izin Pemanfaatan Air Limbah ke Tanah untuk Aplikasi pada Tanah di Perkebunan Kelapa Sawit PT Paramitra Internusa Pratama Kecamatan Semitau Kabupaten Kapuas Hulu". Permit valid for 5 years. Term and conditions is BOD cannot exceed 5000 mg/ltr and pH ranged at 6-9. Application area covers 832 Ha.</p> | |
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| | | PT Paramitra Internusa Pratama has submitted GHG emissions through the RSPO PalmGHG calculator https://ghg.rspo.org/dashboard/mills/889/assessments/2579 . | |
| 7.10.2 | <p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p> | Based on field observation and review of Area Statement, there is no new planting after 2014 in PT Paramitra Internusa Pratama – Belian Estate and Tengawang Estate. Planting after 2014 are conducted in Scheme Smallholder (KKPA) area. It has been covered in the NPP published in 2014. | Complied |
| 7.10.3 | <p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p> | <p>PT Paramitra Internusa Pratama has identified other significant pollutants such as emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB. Monitoring of air emissions and ambient quality conducted every semester. Emissions test conducted by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency of Kapuas Hulu Regency every six months, e.g: result of analysis for air emission and Ambient in Belian Estate and Tengawang Estate.</p> <p>Management efforts to reduce or minimize those pollutant is such as implementation of zero burning, planting trees at the riparian, utilization EFB, reducing the use of fossil fuel with the use of fibres and shells for boiler fuel, emissions test, routine engine maintenance and GHG calculation. Sample of management efforts to reduce pollutants are observed during audit, such as there is no burning activities, there are peat conservation area in Belian Estate and Tengawang Estate, and the uses fibres and shell as fuel in Belian POM.</p> | Complied |
| Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area. | | | |
| 7.11.1 | <p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p> | Based on field observation and review of Area Statement, planting year of PT Paramitra Internusa Pratama – Belian Estate and Tengawang | Complied |

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| | | <p>Estate are ranged from 2008 to 2014. New planting after 2014 is done in other estate/smallholder, such as Belian KKPA (PT Paramitra Internusa Pratama), Kapuas Hulu KKPA (PT Persada Graha Mandiri) and Muara Tawang KKPA (PT Kartika prima Cipta). Refer to the oldest oil palm planting in Belian Estate and Tengkwang Estate, replanting estimated to be started in 2033.</p> <p>Based on interview to the workers and stakeholders, there were no land preparation performed by burning. Land preparations were conducted by mechanical methods using heavy equipment.</p> | |
| 7.11.2 | <p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama has established fire prevention and control measures for land such as provides Firefighting team and its equipment, developed fire watch tower, conduct monitoring for hotspots and forming fire protection program by involving surrounding local communities namely "<i>Masyarakat Siaga Api</i>".</p> <p>Available report of system and infrastructure preparedness for land fire ("<i>Laporan Kesiapsiagaan Sistem, Sarana dan Prasarana Pengendalian Kebakaran Lahan Perkebunan</i>") period January – June 2024. Report covers Plantation fire control task force; human resources for plantation land fire control; plantation land fire control operations; and infrastructure for plantation land fire control.</p> <p>The company has shown evidence of a forest and land fire prevention alert held on 1 August 2024 which was attended by Manggala Agni, security guards, babinsa, village heads. With more than 50 participants.</p> <p>Fire reporting to the Kapuas Hulu National Disaster Management Agency on 2 August 2024.</p> | Complied |
| 7.11.3 | <p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p> | <p>PT Paramitra Internusa Pratama has established fire prevention and control measures for land such as provides Firefighting team and its equipment, developed fire watch tower, conduct monitoring for hotspots</p> | Complied |

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| | | <p>and forming fire protection program by involving surrounding local communities namely "<i>Masyarakat Siaga Api</i>".</p> <p>Available report of system and infrastructure preparedness for land fire ("<i>Laporan Kesiapsiagaan Sistem, Sarana dan Prasarana Pengendalian Kebakaran Lahan Perkebunan</i>") period January – June 2024. Report covers Plantation fire control task force; human resources for plantation land fire control; plantation land fire control operations; and infrastructure for plantation land fire control.</p> <p>The company has shown evidence of a forest and land fire prevention alert held on 1 August 2024 which was attended by Manggala Agni, security guards, babinsa, village heads. With more than 50 participants.</p> <p>Fire reporting to the Kapuas Hulu National Disaster Management Agency on 2 August 2024.</p> <p>In addition, the Company has also conducted HCV socialization and prevention of forest and land fires to surrounding communities on July 30, 2024 (Tua Abang Village and Sekedau Village) which was attended by 24 representatives.</p> | |
| <p>Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p> | | | |
| <p>PROCEDURAL NOTE for 7.12:</p> <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> | | | |

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The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.

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| 7.12.1 | <p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p> | <p>Unit of certification is an existing plantation since 2008. HCV assessment conducted in 2011 and verification assessment in 2014 by internal team which has been registered as RSPO-approved assessor. Unit of Certification completed the NPP notification in 2014.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out by unit of certification as below:</p> <ul style="list-style-type: none"> - 29/8/2014: GAR submit liability data and zero liability disclosure to RSPO for all subsidiaries, including PT Paramitra Internusa Pratama. - 15/12/2015: Submission of Land Use Change Analysis (LUCA) for GAR concessions. There are 12 companies were submitted, including PT Paramitra Internusa Pratama. - 19/04/2022: RSPO send LUCA status of PT Paramitra Internusa Pratama, where the LUCA status is Pass with Final Compensation Liability is 1,974.83 Ha and Environmental Remediation Area is 92.5 Ha. <p>Unit of certification has submitted LUCA in accordance with the RSPO LUCA Guidance document.</p> <p>On 1 September 2023 RSPO issued RSPO Remediation and Compensation Plant for Golden Agri-Resources, Ltd (GAR) which includes Compensation Liability 1,974.83 Ha and Environmental Remediation Area is 92.5 Ha. PT PIP's remediation details are for 16 rivers including:</p> <ol style="list-style-type: none"> 1. Sungai Lebak Kera 2.37 ha 2. Sungai Liut 4.64 ha 3. Sungai Pelimbus 1.87 | Complied |
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| | | <p>4. Sungai Peniti Tayan 3.09</p> <p>5. Sungai Sedundun 8.80 ha</p> <p>6. Sungai Lemedak 43.63 ha</p> <p>7. Sungai Pelimbus 1.87 ha</p> <p>8. Sungai Anak Lemedak 2.60 ha</p> <p>9. Sungai Tekedan 5.30 ha</p> <p>10. Sungai Sentabai 1.31 ha</p> <p>11. Sungai Atin 1.17 ha</p> <p>12. Sungai Rukam Hilir 2.26 ha</p> <p>13. Sungai Rukam Hulu 0.10 ha</p> <p>14. Sungai Rusa 1.55 ha</p> <p>15. Sungai Jalang 7.14 ha</p> <p>16. Sungai Jetu 3.67 ha</p> <p>Monitoring and implementation of the remediation of the entire riparian zone will be done in combination with satellite monitoring and on-the-ground monitoring.</p> | |
| 7.12.2 | <p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p> <p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p> | <p>Unit of certification is an existing plantation since 2008. HCV assessment conducted in 2011 and verification assessment in 2014 by internal team which has been registered as RSPO-approved assessor.</p> <p>Then, the existing HCV assessments remains valid.</p> <p>There is no new acquisition or expansion area or new planting after 15 November 2018 within this unit of certification. All planted areas were the original area stated in the NPP notifications.</p> | Complied |

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| 7.12.3 | <p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p> | This indicator is not relevant to Indonesia. | Complied |
| <p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p> | | | |
| 7.12.4 | <p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p> | <p>HCV assessment has been conducted and documented in the "Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Paramitra Internusa Pratama, 2012". HCV Assessment was conducted internally using HCV Toolkit Indonesia 2008, where the assessor is registered as RSPO HCV approved assessor. Total HCV area which identified is 2,179.98 Ha consist of 83 points.</p> <p>In 2014, PT Paratmitra Internusa Pratama conduct HCV verification assessment in December 2014. Based on report of "Laporan Verifikasi Kawasan Bernilai Konservasi Tinggi PT Paramitra Internusa Pratama, Kabupaten Kapuas Hulu, Kalimantan Barat February 2015, HCV area determined as covers 3,874.79 Ha (increase area from previous HCV report 2012).</p> <p>Based on the verification assessment report, type HCV identified is HCV1, HCV2, HCV4, HCV 5 and HCV6.</p> <p>An integrated management plans to protect and/or enhance HCV and other conservation areas are developed, implemented and adapted by unit of certification. The activities plan is documented in "Laporan Pelaksanaan Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi, Tahun 2024". The activities consist of:</p> <ol style="list-style-type: none"> 1. HCV boundary marking. | Non-compliance |

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| | | <ol style="list-style-type: none"> 2. Socialization (direct and indirect) to affected parties. 3. Frequent Communication and Consultation to affected stakeholders. 4. Conserving Water Sources. 5. Reclamation or Reforestation of HCV area. 6. Controlling of Invasive Species. 7. HCV Management Agreement of Community Based . <p>Unit of certification has conducted HCV identification in 2014. Based on the identification results, 3,874.79 Ha of HCV areas were determined, one of which is the riparian areas of Jentu River, Block L52, Division 2, Belian Estate. The certification unit has prepared an HCV management plan for 2023 - 2024. The program includes protection, rehabilitation and mutual agreement with the community.</p> <p>Based on the results of the field visit to the conservation area (HCT) – riparian of Jentu River block L52 Division 2 Belian Estate (referring to the HCV map), obtained information:</p> <ul style="list-style-type: none"> • There are traces of heavy equipment mobilization to the riparian of Jentu River for water hyacinth cleaning activities. The impacts of this mobilization include the opening of HCV areas followed by damage to vegetation in the area. • There are fishing activities by local residents indicated by the presence of several traces of burning activities by fishing groups in the area. In addition, cooking equipment was found stored in the area. This indicates that these activities have been carried out continuously. | |
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| | | Based on these facts, it can be concluded that this is not in accordance with the SOP for HCV Management and Monitoring (SOP/SMART/BCOS-EHSD/SADV/I/002) dated 1 July 2014 and the management plan that has been established. This is raised as noncompliance . | |
| 7.12.5 | Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance - | Unit of certification is an existing plantation since 2008. There is no expansion area for plantations. Entire land compensation is accomplished since 2019. Land status of certificate holder prior to developed is State Land and have obtaining Location Permit from relevant authority. Community land which located within location permit already compensated for its crops only and not for its land, due to as national land status is State Land. As a reciprocal, the company hires villagers/local communities as workers. This is form of benefit given by the plantation to surrounding communities. This information is obtained from direct interview with sample of previous landowner during stakeholder consultation. HCV assessment has been conducted since 2011 and verification assessment conducted since 2014. There are no rights of local communities have been identified in HCV area, also no peatland or other conservation area within the unit of certification. | Complied |
| 7.12.6 | All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working | The company has an SOP for HCV management and monitoring with the number SOP/SMART/BCOS-EHSD/SADV/I/002 which became effective on July 1, 2024. The SOP explains about Boundary demarcation, socialization (direct and indirect), HCV rehabilitation, HCV security, exotic plant control, implementation of HCV | Complied |

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| | <p>for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p> | <p>monitoring, HCV utilization, reporting on HCV management and monitoring activities, distribution of HCV management and monitoring reports.</p> <p>Unit of certification has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programed each year as per "Conservation Management Plan". Socialization has been conducted through muster morning in each division by field assistant. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people.</p> <p>Company also implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990.</p> <p>Based on HCV Identification Assessment 2011 and Verification Assessment in 2014, there are RTE species were identified and current protection status by IUCN as below:</p> <ol style="list-style-type: none"> 1. Mammals: Helarctos malayanus (VU), Hylobates muelleri (EN), Manis javanica (EN), Neofelis nebulosa (VU), Nycticebus coucang (VU), Pardofelis marmorata (VU), Cervus unicolor (VU), Aonyx cinerea (VU), Sus barbatus (VU). 2. Birds/Aves: Spizaetus nanus (VU), Lophura erythrophthaima (VU). 3. Reptile: Tomistoma schlegelii (EN). <p>Flora: Nepenthes bellii (EN), Shorea palembanica (CR), Shorea seminis v. Slooten (CR), Aquilaria malaccensis (VU), Combretocarpus rotundatus (VU), Cotylelobium lanceolatum Craib. (VU), Dryobalanops aromatica (CR), Hopea mengarawan (CR), Shorea belangeran (CR), Shorea fosworthyi (CR), Shorea peltate (CR), Shorea platycarpa (CR), Shorea smithiana (CR).</p> | |
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| | | The Company has shown evidence of HCV and fire prevention socialization to employees on 22-25 July 2024, 29 July 2024 and to surrounding communities on 30 July 2024 (Tua Abang Village and Sekedau Village). | |
| 7.12.7 | <p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p> | <p>Based on "Laporan Pelaksanaan Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi Tahun 2021", wildlife species monitored by unit of certification but only two RTE species was sighted/found within HCV in plantation area refer to IUCN, there are Macaca fascicularis and Megalaima rafflesii.</p> <p>Species and HCV area that was monitored and reported every year will be integrated to the next year HCV management and monitoring plan.</p> <p>The company has presented a report on the implementation of management and monitoring of high conservation value areas in 2023. The report states that:</p> <ol style="list-style-type: none"> 1. HCV management and monitoring activities in PT PIP are already quite good. 2. Based on the biodiversity analysis, the mammal class animal species with a value of 0.85 and herpetofauna with a value of 0.69 falls into the low category, for the aves class with a value of 2.97 falls into the medium category. 3. There is an agreement document between PT PIP and surrounding villages with agreement points: <ul style="list-style-type: none"> • Support all high conservation value area management activities carried out to preserve the environment. • Participate in maintaining and protecting the existence of high conservation value areas. <p>Suggestions and follow-up for management in the coming year is:</p> <ul style="list-style-type: none"> • Carrying out interviews to gather information on HCV 5 and 6 | Complied |

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| | | <ul style="list-style-type: none"> Carrying out internal outreach activities, especially to staff and externally (community around the village) Complete the river border rehabilitation documents that have been carried out in the form of plant census results to obtain the percentage of survival Monitoring and managing the condition of the rehabilitation area. <p>The company has also shown proof of reporting its HCV management and monitoring activities to the West Kalimantan Province BKSDA on 2 September 2024 and to the West Kalimantan Province Environment and Forestry Service on 23 August 2024.</p> | |
| 7.12.8 | <p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p> | <p>Unit of certification PT Paramitra Internusa Pratama as subsidiary of Golden Agri Resources (GAR) has demonstrate the updated evidence of Remediation and Compensation Procedures (RaCP) processes.</p> <p>On 1 September 2023 RSPO issued RSPO Remediation and Compensation Plant for Golden Agri-Resources, Ltd (GAR) which includes Compensation Liability 1,974.83 Ha and Environmental Remediation Area is 92.5 Ha. PT PIP's remediation details are for 16 rivers including:</p> <ol style="list-style-type: none"> 1. Sungai Lebak Kera 2.37 ha 2. Sungai Liut 4.64 ha 3. Sungai Pelimbus 1.87 4. Sungai Peniti Tayan 3.09 5. Sungai Sedundun 8.80 ha 6. Sungai Lemedak 43.63 ha 7. Sungai Pelimbus 1.87 ha | Complied |

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| | | <ul style="list-style-type: none">8. Sungai Anak Lemedak 2.60 ha9. Sungai Tekedan 5.30 ha10. Sungai Sentabai 1.31 ha11. Sungai Atin 1.17 ha12. Sungai Rukam Hilir 2.26 ha13. Sungai Rukam Hulu 0.10 ha14. Sungai Rusa 1.55 ha15. Sungai Jalang 7.14 ha16. Sungai Jentu 3.67 ha <p>Monitoring and implementation of the remediation of the entire riparian zone will be done in combination with satellite monitoring and on-the-ground monitoring.</p> | |
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Belian Mill** and supply base was calculated using the PalmGHG Calculator Version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.49 |
| PKO | 1.49 |

| Extraction | % |
|------------|-------|
| OER | 24.54 |
| KER | 5.75 |

| Production | t/yr |
|--------------|------------|
| FFB Process | 316,852.68 |
| CPO Produced | 77,756.40 |
| PKO Produced | 18,208.10 |

| Land Use | Ha |
|-----------------------------|------------------|
| OP Planted Area | 15,454.67 |
| OP Planted on peat | 1,057.82 |
| Conservation (forested) | 4,487.78 |
| Conservation (non-forested) | 2,629.30 |
| Total | 23,629.57 |

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 | 70,551.81 | 0.76 | 111,937.43 | 0.50 | 0.00 | 0.00 | 182,489.23 | 1.26 |
| CO ₂ Emission from fertilizer | 4,853.64 | 0.05 | 17,277.77 | 0.08 | 0.00 | 0.00 | 22,131.41 | 0.13 |
| NO ₂ Emission | 3,930.03 | 0.04 | 12,981.12 | 0.06 | 0.00 | 0.00 | 16,911.16 | 0.10 |
| Fuel Consumption | 1,005.65 | 0.01 | 2,868.12 | 0.01 | 0.00 | 0.00 | 38,73.77 | 0.02 |
| Peat Oxidation | 54,525.20 | 0.59 | 3,066.25 | 0.01 | 0.00 | 0.00 | 57,591.45 | 0.60 |
| Sink | | | | | | | | |
| Crop Sequestration | -49,120.53 | -0.53 | -105,465.00 | -0.47 | 0.00 | 0.00 | -154,585.53 | 1.00 |
| Conservation Sequestration | -4,352.08 | -0.05 | -36,800.86 | -0.16 | 0.00 | 0.00 | -41,152.94 | 0.21 |
| Total | 88,869.22 | 0.96 | 6,307.84 | 0.03 | 0.00 | 0.00 | 95,177.06 | 2.22 |

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 46,997.50 | 0.15 |
| Fuel Consumption | 548.81 | 0.00 |
| Grid Electricity Utilization | 0.00 | 0.00 |
| Credit | | |
| Export of Grid Electricity | 0.00 | 0.00 |
| Sales of PKS | 0.00 | 0.00 |
| Sales of EFB | 0.00 | 0.00 |
| Total | 47,546.31 | 0.15 |

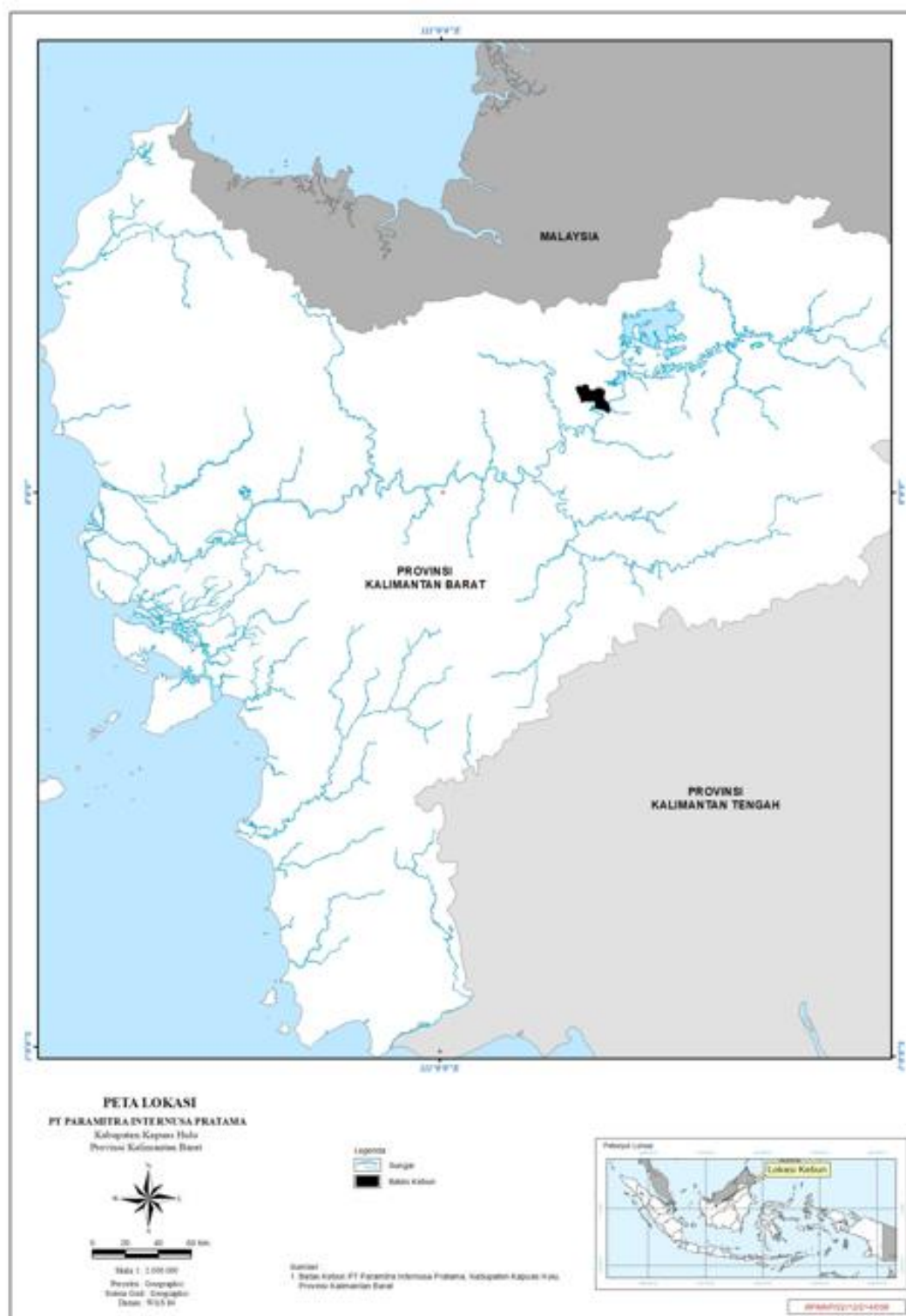
Summary of Kernel Crusher Emission and Credit (if applicable)

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

* This mill has no kernel crusher operation.

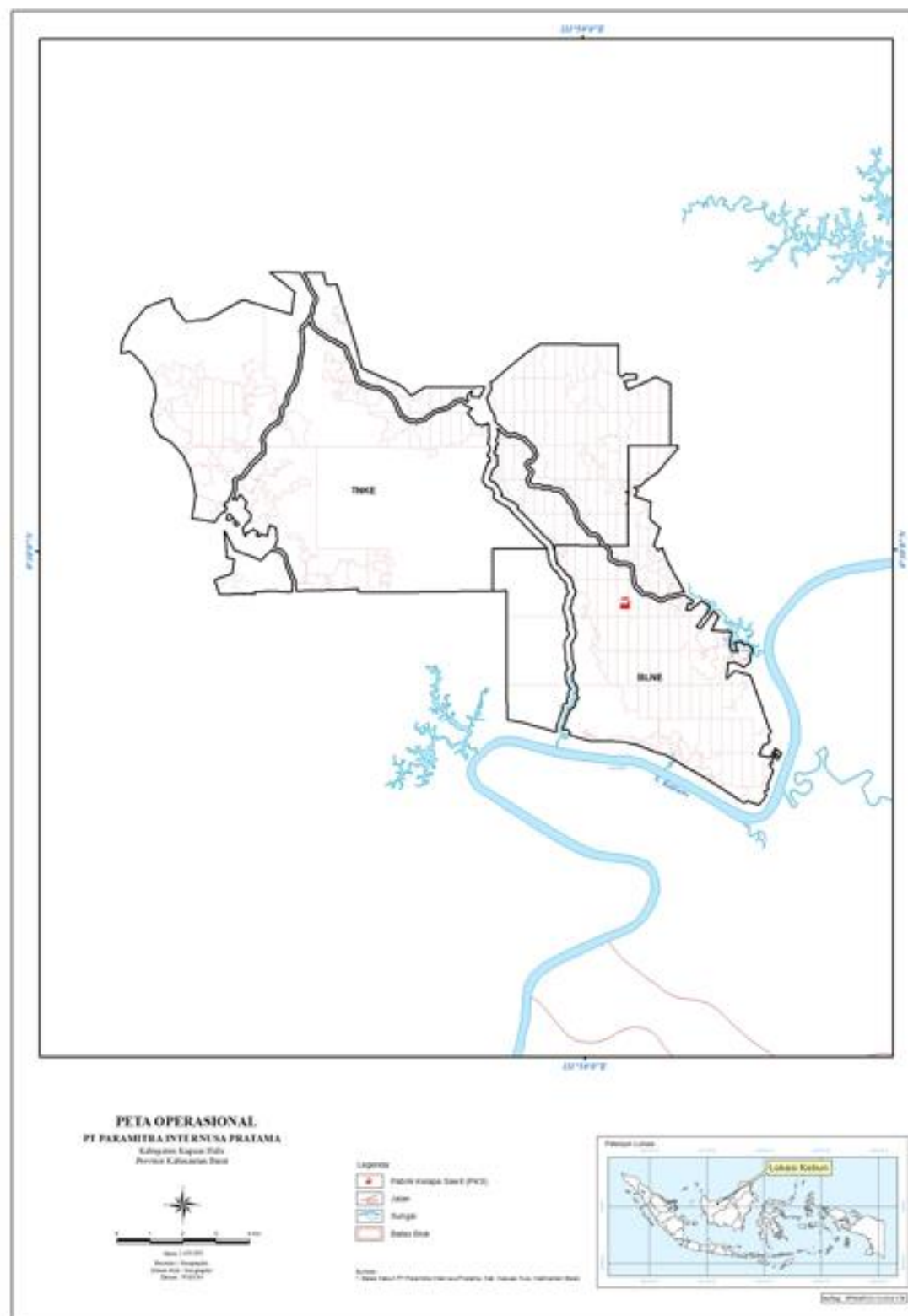
| Palm Oil Mill Effluent (POME) Treatment: | |
|--|-----|
| Divert to Compost (%) | 0 |
| Divert to anaerobic diversion (%) | 100 |

| POME Diverted to Anaerobic Digestion: | |
|--|----|
| Divert to anaerobic pond (%) | 70 |
| Divert to methane captured (flaring) (%) | 30 |
| Divert to methane captured (energy generation) (%) | 0 |

Appendix C: Location Map of Certification Unit and Supply bases

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Appendix D: Estate Field Map



Appendix E: List of Smallholder Registered and/or sampled

Not applicable

Appendix F: List of Abbreviations

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