

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- ☐ Initial Assessment
- ☒ Annual Surveillance Assessment (1_2)
- ☐ Recertification Assessment (Choose an item.)
- ☐ Extension of Scope

Client Company Name / Parent Company: PT Bumi Sawit Permai / Golden Agri-Resources Ltd
Client Company / Parent Company Address: Plaza Sinar Mas Land, Menara II, Lantai 30. Jl. MH Thamrin No 51. Jakarta, Indonesia
Certification Unit: PT Bumi Sawit Permai - Bumi Sawit Mill Location of Certification Unit: Desa Tanjung Miring, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, 30869, Province Sumatera Selatan, Indonesia
Date of Final Report: 31/07/2024

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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	Plaza Sinar Mas Land, Menara II, Lantai 30. Jl. MH Thamrin No 51, 10350, Jakarta, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Bumi Sawit Permai – Bumi Sawit Mill		
Location / Address	Desa Tanjung Miring, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, 30869, Province Sumatera Selatan, Indonesia		
Website	www.goldenagri.com.sg		
Management Representative	Yahya Mustakim	E-mail	Yahya.mustakim@sinarmas-agri.com
Telephone	+62 (21)-5033889	Facsimile	+62 (21)-3181389

2. Certification Information			
Certificate Number	RSPO 733461	Certificate Start Date	19/09/2022
Date of First Certification	09/10/2015	Certificate Expiry Date	18/09/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK).		
Visit Objectives	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_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	30 tonnes FFB/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
BSI-ISPO 740250	ISPO	PT BSI Group Indonesia	03 December 2026
EU-ISCC-Cert-ID218-20230165	ISCC EU	PT Intertek Utama Services	18 July 2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bumi Sawit Mill	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, Province of Sumatera Selatan, Indonesia	3° 31' 32.52" S	104° 20' 39.48" E
Bumi Sawit Estate	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, Province of Sumatera Selatan, Indonesia	3° 30' 39.00" S	104° 20' 05.00" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bumi Sawit Estate	4,373.10	335.43	4,450.80	8,823.90	49.56
Total	4,373.10	335.43	4,450.80	8,823.90	49.56

Note:

- HCV area = 335.43 Ha is included in planted area of 4.373,10 Ha
- Regarding the HCV area in the planted area (Division 6 and Division 4), based on the results of field observations, the area is located on the river border (riparian) and the company does not carry out management activities on the river border such as using fertilizer, spraying herbicides or manual weeding. The condition of the border is left natural without any treatment.

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bumi Sawit Estate	444.08	64.93	428.34	3,435.75	3,929.02	444.08
Total (ha)	444.08	64.93	428.34	3,435.75	3,929.02	444.08

Note: Only Mature area is considered as production area

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sept 2023 – Aug 2024)	Actual (June 2023 – May 2024)		Forecast (Sept 2024 – Aug 2025)
		Previous license period (June 2023 – September 2023)	Current license period (October 2023 – May 2024)	
Bumi Sawit Estate	86,103.71	31,631.77	43,845.38	35,003.52
Total	86,103.71	75,477.15		35,003.52

Note: The reduction in the estimated FFB production for the next 12 months is due to the current progress of replanting in several divisions within the scope of certification for plants aged more than 25 years (3,435.75 ha).

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year	Actual		Forecast
		Previous license period	Current license period	
-	-	-	-	-
-	-	-	-	-
Total	-	-		-

Note: -

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

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Sept 2023 – Aug 2024)	Actual (June 2023 – May 2024)		Forecast (Sept 2024 – Aug 2025)
		Previous license period (June 2023 – September 2023)	Current license period (October 2023 – May 2024)	
Bumi Sawit Estate (Non-Certified)	-	8,573.670	10,559.240	-
Sawit Mas Estate (Non Certified)	-	3,317.840	3,934.430	-
PT Anugerah Agung Amanah	-	5,085.230	2,220.980	-
PSR Muara Enim	-	930.240	2,023.400	-

Ramp BSP 2750 (PT. Anugerah Agung & PT Sinar Buah Sejahtera)	-	-	11,657.590	-
Total	-	48,302.62		-
Note: -				

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	June 2023	7,334.19	4,099.98	11,434.17
2	July 2023	7,635.41	4,106.60	11,742.01
3	August 2023	8,615.15	4,858.00	13,473.15
4	September 2023	8,047.02	4,842.40	12,889.42
5	October 2023	7,455.43	4,743.87	12,199.30
6	November 2023	8,337.42	4,255.37	12,592.79
7	December 2023	5,764.26	3,688.08	9,452.34
8	January 2024	5,453.01	3,292.24	8,745.25
9	February 2024	4,079.57	2,287.48	6,367.05
10	March 2024	4,367.42	2,618.89	6,986.31
11	April 2024	4,015.35	5,388.00	9,403.35
12	May 2024	4,372.92	4,121.71	8,494.63
TOTAL		75,477.15	48,302.62	123,779.77
Note: -				

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Sept 2023 – Aug 2024)	Actual (June 2023 – May 2024)		Forecast (Sept 2024 – Aug 2025)
	Previous license period (June 2023 – September 2023)	Current license period (October 2023 – May 2024)	
FFB	FFB		FFB
86,103.71 mt	31,631.77 mt	43,845.38 mt	35,003.52 mt
	TOTAL	75,477.15 mt	
CPO (OER: 20.50 %)	CPO (OER: 19.58 %)		CPO (OER: 20.50 %)
17,651.26 mt	6,521.67 mt	8,502.25 mt	7,175.72 mt
	TOTAL	15,023.92 mt	

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PK (KER: 6.00 %)	PK (KER: 5.64 %)		PK (KER: 6.00 %)
5,166.22 mt	1,957.64 mt	2,558.37 mt	2,100.21 mt
	TOTAL	4,516.01 mt	
Note: -			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	June 2023	1,475.93	433.75
2	July 2023	1,541.09	468.87
3	August 2023	1,817.57	569.63
4	September 2023	1,687.09	485.37
5	October 2023	1,431.85	468.83
6	November 2023	1,519.97	510.71
7	December 2023	1,199.27	344.56
8	January 2024	1,122.27	268.84
9	February 2024	835.53	229.64
10	March 2024	860.82	258.41
11	April 2024	745.42	229.97
12	May 2024	787.11	247.43
TOTAL		15,023.92	4,516.01
Note: -			

11. Summary of Actual Volume sold					
Current License period (October 2023 – May 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	9,399.78	-	-	9399.78
PK (MT)	2,455.97	-	-	-	2,455.97
Credits	-	-	-	-	-
Previous License period (June 2023 – September 2023)					
CPO (MT)	-	5,587.50	-	-	5,587.50
PK (MT)	2,018.87	-	-	-	2,018.87
Credits	-	-	-	-	-
Note:					

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Conventional is RSPO certified material but sold as non-RSPO.

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1.	PT Sumber Indah Perkasa	TR-fd8ff750-ea19	-	145.89
2	PT Sumber Indah Perkasa	TR-1afea1b8-4899	-	101.95
3	PT Sumber Indah Perkasa	TR-e3a9f4a5-d7e2	-	101.25
4	PT Sumber Indah Perkasa	TR-67fc793b-e245	-	101.56
5	PT Sumber Indah Perkasa	TR-76103986-352b	-	140.1
6	PT Sumber Indah Perkasa	TR-af335f3a-adf2	-	100.93
7	PT Sumber Indah Perkasa	TR-4a386ac3-f46f	-	101.17
8	PT Sumber Indah Perkasa	TR-edcbbd39-6b3c	-	83.05
9	PT Sumber Indah Perkasa	TR-dd1bb1ae-2ccd	-	101.79
10	PT Sumber Indah Perkasa	TR-915ea128-00c8	-	142.32
11	PT Sumber Indah Perkasa	TR-56fc0f26-5ec0	-	202.43
12	PT Sumber Indah Perkasa	TR-5b74ce55-bd4f	-	188.73
13	PT Sumber Indah Perkasa	TR-111fa08e-c073	-	203.66
14	PT Sumber Indah Perkasa	TR-14d34d91-ecbe	-	101.73
15	PT Sumber Indah Perkasa	TR-a3e92e68-f4de	-	101.93
16	PT Sumber Indah Perkasa	TR-94bb0a4b-f0ab	-	100.38
17	PT Sumber Indah Perkasa	TR-83750fe5-6e60	-	143.87
18	PT Sumber Indah Perkasa	TR-1bfd0ef0-8e65	-	101.56
19	PT Sumber Indah Perkasa	TR-db9767d3-3d44	-	140.94
20	PT Sumber Indah Perkasa	TR-938a5822-5e38	-	84.22
21	PT Sumber Indah Perkasa	TR-0050ca2f-ae55	-	146.49
22	PT Sumber Indah Perkasa	TR-0c5fa5d4-6f52	-	145.15
23	PT Sumber Indah Perkasa	TR-953b7696-54ed	-	146.91
24	PT Sumber Indah Perkasa	TR-15664b99-8f34	-	101.7
25	PT Sumber Indah Perkasa	TR-95f31dd6-6e78	-	141.17
26	PT Sumber Indah Perkasa	TR-afb8fd27-1c20	-	101.92
27	PT Sumber Indah Perkasa	TR-d6e229b5-9b33	-	101.66
28	PT Sumber Indah Perkasa	TR-c5ed5afa-cee9	-	143.74
29	PT Sumber Indah Perkasa	TR-62a1aa86-465e	-	100.19

30	PT Sumber Indah Perkasa	TR-4eba7afa-bdab	-	101.65
31	PT Sumber Indah Perkasa	TR-20fa2055-cbe7	-	101.71
32	PT Sumber Indah Perkasa	TR-a7213157-15cb	-	101.41
33	PT Sumber Indah Perkasa	TR-9ae7ba0f-650e	-	101.78
34	PT Sumber Indah Perkasa	TR-c37e1053-9e8f	-	101.74
35	PT Sumber Indah Perkasa	TR-e45a3314-ab6b	-	100.24
36	PT Sumber Indah Perkasa	TR-05ad2de9-5e3c	-	146.55
37	PT Sumber Indah Perkasa	TR-934318b3-fb66	-	101.37
TOTAL			-	4,474.84

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)
1	PT Sumber Indah Perkasa	ISCC	614.06	-
2	PT Sumber Indah Perkasa	ISCC	2,031.40	-
3	PT Sumber Indah Perkasa	ISCC	1,561.80	-
4	PT Sumber Indah Perkasa	ISCC	1,380.24	-
5	PT Sumber Indah Perkasa	ISCC	1,668.40	-
6	PT Sumber Indah Perkasa	ISCC	1,860.73	-
7	PT Sumber Indah Perkasa	ISCC	1,426.42	-
8	PT Sumber Indah Perkasa	ISCC	1,018.00	-
9	PT Sumber Indah Perkasa	ISCC	1,063.28	-
10	PT Sumber Indah Perkasa	ISCC	730.51	-
11	PT Sumber Indah Perkasa	ISCC	883.51	-
12	PT Sumber Indah Perkasa	ISCC	748.93	-
TOTAL			14,987.28	-

Note: -

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	-	-	-
2	-	-	-
TOTAL		-	-

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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
1	-	-	-
2	-	-	-
TOTAL			-

Note: -

12. Independent Smallholders Certified Tonnage (MT) / Volume

	Estimated last year			Actual			Forecast		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

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)
1	-	-	-	-	-	-
2	-	-	-	-	-	-
TOTAL		-	-	-	-	-

Note: 1 mt = 1 credit

13. Independent Smallholders Actual Sold Tonnage / Volume

	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period							
Credits				-	-	-	-
Physical	-	-	-				

Previous License period							
Credits				-	-	-	-
Physical	-	-	-				

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)
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
TOTAL			-	-	-	-	-
Note:							

Section 2: Assessment Process

Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 1 to 5 July 2024. The audit programme is included as Section 2.3.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. 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 PT Bumi Sawit Permai – Bumi Sawit Mill with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)
Bumi Sawit Mill	√	√	√	√	√
Bumi Sawit Estate	√	√	√	√	√

Tentative Date of Next Visit: July 1, 2025 - July 5, 2025

Total Number of Mandays: 9

2.2 BSI Assessment Team

Name	Role	Competency
Briyogi Shadiwa (BS)	Team Leader	<p>Education: Holds an associate degree in Palm Oil Plantation, Bogor Agricultural University (IPB).</p> <p>Work Experience: He has work experience since 2009 - 2016 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. Has participated in many audit activities with certification bodies related to the sustainable palm oil certification system since 2017 with worker welfare, OHS, best management practice, supply chain, social, environmental, GHG, and waste management aspect.</p> <p>Training attended: Completed Endorsed RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, ISO 9001: 2015 CQI & IRCA Lead Auditor Course, SA8000 Introduction and Basic Auditor Training Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course by Checkmark, ISO 14001: 2015 CQI & IRCA Lead Auditor Course, SMK3 Awareness, OHSAS 18001:2007 Awareness, ISO 45001:2018 Awareness, OHS Expert Training (<i>Ahli K3 Umum</i>), and Endorsed RSPO Refreshment Trainings.</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>
Andi Pratama Pasaribu	Team Member	<p>Education: Holds a Bachelor Degree majoring Social Economy, Jember University</p> <p>Work Experience: 5 years working experience as Field Agronomy Assistant. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training, Endorsed RSPO P&C Lead Auditor course, Introductory</p>

		<p>Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 9001:2008 Lead Auditor course, ISO 14001:2005 Lead Auditor course, ISO45001:2018 Lead Auditor Course, RSPO endorsed RSPO SCCS Lead Auditor course, SMETA requirements training</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Naila Karima	Team Member	<p>Education: Holds a bachelor's degree majoring Occupational Safety and Health, Faculty of Public Health, University of Indonesia.</p> <p>Work Experience: 10 years working experience as auditor since 2012 covering RSPO and ISPO.</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, ISPO Auditor/Lead Auditor Course, SA8000 Requirements Training, RSPO Labour Auditing Training, RSPO Independent Smallholder Training by RSPO Secretariat, ISO 9001, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, and Endorsed RSPO Refresher Trainings.</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 type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

Accompanying Persons:

Name	Role
-	

2.3 Assessment Plan

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

Date	Time	Subjects	BS	AP	NK
Monday, 01/07/2024	07.35 – 08.45	Flight Jakarta to Palembang (GA-102)	√	√	√
	09.00 – 12.00	Palembang → PT Bumi Sawit Permai	√	√	√
	14.00 – 15.30	Opening Meeting - Introduction by Auditee - Presentation by BSI Indonesia	√	√	√
Tuesday, 02/07/2024	09.00 – 12.00	Stakeholder Consultation: Interview with Stakeholders from Kabupaten Ogan Ilir: BPN, DLH, Dinas Tenaga Kerja, Dinas Perkebunan, Previous Land Owner, Local NGO.	√		√
		Document and Record Verification		√	

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Date	Time	Subjects	BS	AP	NK
	12.00 – 14.00	Break	√	√	√
	14.00 – 16.30	Field Observation Bumi Sawit Mill: - Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Dispatch CPO) - ENS, Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) - Implementation of Employment Procedure and Mechanism Aspect.	√	√	
		Stakeholder Consultation and Document review: Interview with Gender Committee, Labour Union, worker representative, FFB Supplier, Local Contractor (employment, welfare).			√
	16.30 – 17.00	Wash-up Meeting	√	√	√
Wednesday 03/07/2024	08.00 – 12.00	Field Observation Bumi Sawit Estate: - Implementation of Legal Aspect (Land Ownership, Legal Boundaries) - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) - Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) - Implementation of Occupational Health & Safety Aspect - Implementation of Employment Procedure and Mechanism Aspect - Observation of Workers Facilities (Housing, School, Worship Place). - Interview with related personnel during field observation.	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 16.30	Document and Record Verification	√	√	√
	16.30 – 17.00	Wash-up Meeting	√	√	√
	08.00 – 12.00	Document and Record Verification	√	√	√
Thursday 04/07/2024	12.00 – 14.00	Break	√	√	√
	14.00 – 16.30	Document and Record Verification	√	√	√
	16.30 – 17.00	Wash-up Meeting	√	√	√
	08.00 – 10.00	Closing Meeting	√	√	√
Friday 05/07/2024	10.00 – 14.00	Travelling PT Bumi Sawit Permai → Palembang	√	√	√

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Date	Time	Subjects	BS	AP	NK
	18.00 – 19.00	Flight from Palembang → Jakarta (GA-109)	√	√	√

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Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Golden Agri Resources' 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		
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>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), 	Complied

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	<p>LUCA report is in the process of being revised and will be sent to the RSPO.</p> <ul style="list-style-type: none"> • 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 (Medan 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. • PT Aditunggal 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 (Sa[iri 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 	
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	<p>HCS Report obtains Satisfactory status from the HCVRN.</p> <ul style="list-style-type: none"> 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. 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 	Complied

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	<p>become subject of sanction. For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014.</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p> <p><i>Note:</i></p>	<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 on some points raised. Update as of 3 May 2024: The complaint is formally closed. - 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 	Complied

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	<p>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.</p> <ul style="list-style-type: none"> - 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 Data</i>, 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 	
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	<p>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 has been published on the RSPO website.</p> <p>Update as of 28 Jun 2023: Selection process for the independent investigator ongoing.</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 28 Jun 2023: The Secretariat is still in the midst of preparing the Briefing Notes for Phases 3, 4 & 5.</p> <p>In the RSPO RaCP Tracker, Audit team noted 32 MUs with potential liability, 26 MU with LUCA submitted, 20 MU with LUCAs review completed, 31 MU with CN required, 18 MU with CN submitted, 11 MU with CN approved, 11 MU with CP submitted, 11 MU with CP endorsed, 26 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	In the RSPO Case Tracker, Audit team noted there was no active complaint related to labour disputes.	Complied

	<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>	
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 requirements, the necessary documentation, and flowcharts that provide a detailed process for evaluating compliance with legal regulations.</p>	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	<p>Yes, 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 Persada Graha Mandiri (Kapuas Hulu Estate and Sungai Beran Estate), supply bases of Pekawai Mill; carried out on 24 – 27 July 2023 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 SMART Tbk (Bukit Kapur Mill, Sungai Cantung Estate and Bukit Kapur Estate) carried out on 12 – 16 December 2022. 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 and Jalemo Estate) carried out on 21 – 25 November 2022. Internal audit team issued NC related to 2.1.1, 6.2.1, 7.3.1 and 7.12, management is preparing correction and corrective action. - Internal audit for PT Bina Sawit Abadi Pratama (Perdana Mill, Perdana Estate, Lenggana Estate, Semandau Estate and Muara Dua Estate) carried out on 13 – 17 June 2022. Internal audit team issued NC related to 2.1.1 and 7.12, 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 	Complied

	<p>endorsement of an independent investigator from the list of candidates submitted.</p> <p>- 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.</p> <p>For other stakeholders, audit team sent email to national NGOs, until assessment ends, audit team did not received response.</p>	
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3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	Currently, the scheme smallholder still in development progress (as mentioned in indicators 5.1.8).	Complied

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Approved Time Bound Plan

There was revision in the company time bound plan, has been sent to RSPO for review and approval on 3rd April 2024. The revised Time Bound Plan has been approved by RSPO Secretariat 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	

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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
3.1	PT SAWITAKARYA MANUNGGUL	KALIMANTAN SELATAN	SWTE	SAWITA ESTATE	3,810	2021	2023	
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	Land legality process
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	
4.2	PT KRESNA DUTA AGROINDO (PLASMA)	KALIMANTAN TIMUR	RPNA	RANTAU PANJANG KKPA	982	2023	2027	Land title (SHM) in progress
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	
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	RaCP in progress; Concept Note reviewing process in RSPO
5.6	PT BUMI SAWIT PERMAI	SUMATERA SELATAN	SLME	SUNGAI LEMATANG ESTATE	2,081	2022	2025	
5.7	PT PRIMA CIPTA MANDIRI	SUMATERA SELATAN	SBGE	SUNGAI BUNGUR ESTATE	2,323	2022	2025	RaCP in progress; Concept Note reviewing process in RSPO
5.8	PT PRIMA CIPTA MANDIRI	SUMATERA SELATAN	SLGE	SUNGAI LINGSING ESTATE	1,025	2022	2025	
6	PT SINAR KENCANA INTI PERKASA	KALIMANTAN SELATAN	SMGM	SUNGAI MAGALAU MILL		2023	2026	RaCP in Progress
6.1	PT SINAR KENCANA INTI PERKASA	KALIMANTAN SELATAN	SNKE	SENAKIN ESTATE	2,787	2023	2026	RaCP in Progress
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 timeboundplan due to operation discontinued

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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)
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	
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	RaCP in progress; Concept Note reviewing process in RSPO
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	
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	-	Exclude from timebound plan due to emerged to Sungai Merak Estate
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	
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	HGU in progress
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	

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11.3	PT BINASAWIT ABADI PRATAMA	KALIMANTAN TENGAH	SMNE	SEMANDAU ESTATE	3,789	2023	2027	HGU in progress, RaCP in progress
11.4	PT BINASAWIT ABADI PRATAMA	KALIMANTAN TENGAH	MDUE	MUARA DUA ESTATE	4,116	2023	2027	
12	PT AGROKARYA PRIMA LESTARI	KALIMANTAN TENGAH	KUYM	KUAYAN MILL		2023	2027	
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 PRIMA LESTARI (PLASMA)	KALIMANTAN TENGAH	SSBA	SUNGAI SAMBON PLASMA	470	2023	2027	
12.5	PT BUANA ADHITHAMA	KALIMANTAN TENGAH	SPRE	SAPIRI ESTATE	2,392	2023	2027	HGU in progress, RaCP in progress
12.6	PT BUANA ADHITHAMA (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	
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	HGU in progress, RaCP in progress
14	PT ADITUNGGAL MAHAJAYA	KALIMANTAN TENGAH	SKOM	SAKO MILL		2023	2027	
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	HGU in progress, RaCP in progress
15	PT AGROLESTARI SENTOSA	KALIMANTAN TENGAH	JLMM	JALEMO MILL		2025	2026	
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	

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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	
16	PT BANGUN NUSA MANDIRI	KALIMANTAN BARAT	KNRM	KENARI MILL		2025	2026	
16.1	PT BANGUN NUSA MANDIRI	KALIMANTAN BARAT	GHRE	GAHARU ESTATE	1,886	2025	2026	HGU in progress, RaCP in progress
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	
16.4	PT BANGUN NUSA MANDIRI - (PLASMA)	KALIMANTAN BARAT	KNRA	KENARI PLASMA	52	2025	2027	Land title (SHM/HGU) in progress, RaCP in progress
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	
18	PT HARAPAN RIMBA RAYA	KALIMANTAN TIMUR	SKDM	SUNGAI KEDANG MILL		2024	2025	HCV/HCS Study in progress, RaCP in progress
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	
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

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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
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

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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
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

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3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were no nonconformities and 1 OFI Opportunity For Improvement Raised.

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

Opportunity for Improvements	
OFI #	Description
OFI 1	The company already has an objective document related to information of FFB indirect supplier, however without considering the company can ensure the archiving FFB indirect supplier geolocation data, it can be but necessary to lead to a future nonconformity if not addressed. (Indicators 2.3.2).

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 #	-	Issued Date	-
Due Date	-	Closure Date	-
Indicator & Category (Critical / Minor)	-		

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Statement of Nonconformity:	-
Requirement Reference:	-
Objective Evidence:	-
Corrections:	-
Root Cause Analysis:	-
Corrective Actions:	-
Assessment Conclusion:	-
Effectiveness Closure (for previous audit closed Critical NC):	-

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: - Verification / Follow-up actions: -

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2001889-202012-M1	Critical	7.12.8	15 December 2020	Closed, 10 March 2021

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Bumi Sawit Permai – Bumi Sawit 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 interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities

to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Environmental Agency of Ogan Ilir Regency	Phone Interview
Governmental Department	Labor Agency of Ogan Ilir Regency	Phone Interview
FFB Supplier	PT Sinar Buah Sejahtera	Phone Interview
Internal	Gender Committee	Face to face interview
Internal	Unit Kerja Serikat Pekerja Kimia, Energi dan Pertambangan Serikat Pekerja Seluruh Indonesia PT Bumi Sawit Permai (Worke Union)	Face to face interview
Government	Land Agency Ogan Ilir Regency	Phone interview
Government	Department of Plantation Ogan Ilir Regency	Phone interview
Communities	Jiwabaru Village	Face to face interview
Communities	Sukananti Village	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: Environmental Agency</p> <ul style="list-style-type: none"> There is no licensing/renewal of environmental permits, liquid waste utilization permits, hazardous waste permits, all permits are still valid, as long as there are no changes and/or additions to other operational activities. Reporting on the implementation of RKL RPL, utilization of liquid waste and management of hazardous waste has been carried out routinely in accordance with the time schedule and there are no delays. The company is committed to managing and monitoring the environment diligently. The agency routinely carries out supervision every year, and the company complies with managing and monitoring environmental aspects/impacts of plantation and factory activities. During the last one year period there were no complaints or claims from the public or other institutions regarding environmental pollution carried out by the company. <p>The company actively communicates with the agency and if there is an invitation for activities from the agency then the company fulfils the invitation.</p> <p>Audit Team verification and response: There is no issues need to further observation.</p>
	Feedbacks: Labor Agency

2	<ul style="list-style-type: none"> The company has implemented provincial minimum wage provisions in accordance with the Decree of the Governor of South Sumatra The company has reported PKWT to the agency, but there is still a delay in the time for recording PKWT, so the company still needs to increase the orderliness of the time for reporting PKWT to 7 working days from the signing of the work agreement between the company and PKWT workers. The company has submitted a <i>Wajib Laporan Ketenagakerjaan</i> In the last one year period there were no reports of industrial relations disputes reported to the agency. If a letter is sent from the agency, it will be sent via telephone and WhatsApp to the Company's PIC first, then the letter will be sent via post, and the company will confirm receipt of the letter from the agency.
	<p>Audit Team verification and response:</p> <p>The company already submit the report to Labor Agency of Ogan Ilir Regency. The latest report has been sent on 01 January 2024 (Letter Number 560/13/PKWT/TRANSTEK.I/2024 for BSWE) and 25 April 2024 (Letter Number 560/05/PKWT/TRANSTEK.III/2024 for BSWM).</p>
3	<p>Feedbacks: PT Sinar Buah Sejahtera</p> <ul style="list-style-type: none"> The supplier understands the criteria requirements for FFB that may enter the mill. If it is not suitable, the FFB will be returned to the supplier. The FFB price is set by the Company in accordance with market prices and FFB price notifications are conveyed to suppliers via WhatsApp. FFB supplier vehicles and drivers are checked for completeness when delivering FFB to mill, including a cover letter, the driver must wear a helmet and shoes, and a driver's license. FFB suppliers understand the provisions on not using child labor, forced labor and human trafficking.
	<p>Audit Team verification and response:</p> <p>No negative issues need to further observation.</p>
4	<p>Feedbacks: Gender Committee</p> <ul style="list-style-type: none"> Gender Committee work program for the 2023/2024 period, policy socialization is carried out during morning briefings before work, posyandu, and inspections of daycare. The company has given permission to women worker who breastfeed their babies during working hours. Leave for pregnant women is 1.5 months before and 1.5 months after giving birth with full wages. There have been no reports of sexual harassment, violence or violations of reproductive rights in the last 1 year. Employee housing is generally still adequate, if there is damage, it can be reported by the Division Assistant to be followed up by the Civil Engineering Assistant for repairs according to material availability.
	<p>Audit Team verification and response:</p> <p>There is no issues need to further observation..</p>
5	<p>Feedbacks:</p> <p>Pimpinan Unit Kerja Serikat Pekerja Kimia, Energi dan Pertambangan Serikat Pekerja Seluruh Indonesia PT Bumi Sawit Permai (Worker Union)</p> <ul style="list-style-type: none"> Labor unions that are currently active for the period 2022 – 2025. The labor union consists of workers' representatives and is not a management representative.

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	<ul style="list-style-type: none"> Union membership is voluntary, with a membership fee of IDR 10,000/month/worker. <i>Perjanjian Kerja Bersama</i> currently for the period 2022 – 2024, will be expired on September 2024. The company has implemented a minimum wage, wage structure/scale and registered workers with BPJS Kesehatan and BPJS Ketenagakerjaan Communication between the union and the company has been well established. <p>Audit Team verification and response: There is no negative issue that need for further verification.</p>
6	<p>Feedbacks: Land Agency Ogan Ilir Regency</p> <ul style="list-style-type: none"> There is no land issue between unit of certification with local communities. The HGU/land title extension process is the authority of the ATR/BPN Ministry Office. Thus, the Ogan Ilir Regency Land Office does not know the entire process. <p>Audit Team verification and response: No negative issues need to further observation. Currently, the process of planting land in the smallholder scheme area is still ongoing, where by 2024 are 67.44 ha has been planted in Koperasi Lubai Sawit Permai.</p>
7	<p>Feedbacks: Department of Plantation Ogan Ilir Regency</p> <ul style="list-style-type: none"> Plantation assessment/Penilaian Usaha Perkebunan (PUP) scheduled in 2024. All the document needed has been informed in July 2024 and field visit in September 2024. There is no land issue so far. Unit of certification had a strength relationship with the plantation agency. All the report has been submitted on time. Smallholder engagement through the scheme smallholder project is on good progress. Progress of <p>Audit Team verification and response: Plantation assessment/Penilaian Usaha Perkebunan (PUP) will be expired in December 2024. Unit of certification has showed the correspondence evidence based on that. There is no land issues so far.</p>
8	<p>Feedbacks: Head of Jiwabaru Village</p> <ul style="list-style-type: none"> No conflict with company. No issues related to environmental aspect There's early communication with company related to scheme smallholder. The head of village was only appointed 6 months ago and is not aware of the Company's relationship with the previous village head. The head of village hope that many people from their village become security in the company. <p>Audit Team verification and response: Based on company statement and list of worker list, there's a inhabitant from Jiwabaru Village who work in company. Regarding to job vacancy for security, the organization said that will inform the vacancy if needed later.</p>
9	<p>Feedbacks: Head of Sukananti Village</p> <ul style="list-style-type: none"> Have a good relationship with company. There's early communication with company related to scheme smallholder. Many smallholder from Sukananti Village sent their FFB to mill via collector. No negative issues related to environmental, social and land boundaries. <p>Audit Team verification and response:</p>

	No negative issues need to further observation.
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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
-					

The scope area has been already conducted replanting activities, so it's not considered to contact previous land owner. As informed by surrounding communities, there's no negative issues related to land conflict.

Previous land owner / user comment

	Feedbacks: -
	Audit Team verification and response: -

3.5 Impartiality and conflict of interest

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

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The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Bumi Sawit Permai – Bumi Sawit 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 Bumi Sawit Permai – Bumi Sawit Mill is remain certified.	
Report prepared by	Acceptance of Assessment Conclusion
Name: Briyogi Shadiwa	Name: Yahya Mustakim
Company Name: PT BSI Group Indonesia	Company Name: PT Bumi Sawit Permai – Bumi Sawit Mill
Title: Lead Auditor	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: 17 July 2024	Date: 17 July 2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.			
Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -	The company shown information available to stakeholder specified in the " <i>Daftar Informasi untuk Stakeholder</i> ", (F/SMART/UMUM /SADV/004/003) updated on 31 May 2024. Type information consisted of: <ul style="list-style-type: none"> • List of employee and basic salary list • Data on <i>Nomor Pokok Wajib Pajak</i> (NPWP) and <i>Pajak Bumi dan Bangunan</i> (PBB) • Payment of local taxes/levies • Environmental Documents • Deed of Incorporation and its Amendments, area and production data, and fertilization application data • Document of land rights/cultivation rights • HCV Report • SIA Report • CSR Report • OHS Program • Continuous Improvement Plan • RSPO Audit Report • Human Rights Policy 	Complied

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		<ul style="list-style-type: none"> Details of complaints and grievances Negotiation Procedure <p>These documents can be accessed by sending a request to the management. Besides, organization also provided their document publicly accessible by publishing company's policy at their website (e.g: human rights policy) and reporting their mandatory report to related stakeholders (e.g: plantation progress report to plantation agency).</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Based on public consultation with related Agency of Ogan Ilir Regency, the company has provided information as needed and stated in a document the type of information that can be conveyed to the relevant agencies properly and transparently. The agency stated that so far, the communication that has been established between the agency and the company has not encountered any issues or complaints. The document that can be access in in Bahasa Indonesia (appropriate languages)	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Records for information and response can be seen in <i>Buku Komunikasi dan Konsultasi</i> (F/SMART/UMUM/SADV/004/001)). From the review period from August 2023 to June 2024, there was no request for data/information from the stakeholders, therefore there was no response. However, the company regularly submitted the mandatory report to the related agency such as in aspect of plantation and land legality (HGU utilization report, plantation progress report), environmental (environmental license document implementation report, waste management report), OHS (employment report, OHS management report), that will be mentioned in related indicators. B Based on public consultation with related Agency of Ogan Ilir Regency, they have understood mechanism of communication and consultation.	Complied

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1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes regarding the consultation and communication procedures. The company showed <i>SOP Komunikasi dan Konsultasi</i> (SOP/SMART/UMUM/SADV/I/004 date 9 February 2015). Consultation and communication with stakeholders conducted by collecting community leaders, village heads and local community or visiting the office/the village hall to meet with the village head, village officials and community. The response to requests for information by the above procedure is at least 3 weeks. Procedures and a list of information available in Indonesian and easily understood.</p> <p>Documents available to the public and stakeholder can be provided to stakeholders according to their relevance through a written request to the organization. Information provided to the public and stakeholder was disseminated to the stakeholder together with social procedure (Information request and response procedure, environmental complain handling, land conflict resolution procedure, and social communication procedure).</p> <p>The procedure has been dissemination to relevant stakeholders in 04 March 2024. The record of dissemination informs that the activities attended by surrounding communities representative, contractors and FFB supplier. Based on public consultation with relevant stakeholder such as Environmental Agency & Manpower Agency of Ogan Ilir Regency, and communities representative its known that they already know about the document that can be access.</p>	Complied
1.1.5	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <p>- Minor compliance -</p>	<p>The company has shown lists of stakeholders arranged by category (government agencies, village, religious leaders/village community and business partners). List of stakeholders is well maintained and updated annually or if there any change by SPO Officer. The last update was performed in 19 June 2024, consist of:</p> <ul style="list-style-type: none"> - Local Communities: Rambang Kuang District Government, Head of 	Complied

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		<p>Kayu Ara Village, Head of Tanjung Miring Village, Head of Sukananti Village, Head of Tambang Rambang Village, Head of Tangai Village, Head of Jiwa Baru Village, and Head of Gunung Raja Village.</p> <ul style="list-style-type: none"> - Statutory bodies: Ogan Ilir Regency (including Agrarian Agency, Manpower Agency, Environment Agency, Health Agency, Dinas Pertanian dan Ketahanan Pangan Agency), South Sumatera Province (including Manpower Agency, BKSDA, BNPB). - Worker Organizations; i.e: Labor Union, Koperasi Karyawan, Gender Committee. - Contractor : PT Satrindo Jaya Agropalma - FFB Supplier : PT Anugerah Agung Amanah, CV Sinar Buah Sejahtera - Other Stakeholders; i.e: Bank Sinarmas, The Forest Trust (TFT) Koramil Muara Kuang, Polres Ogan Ilir, Polres Muara Kuang, Fakultas Pertanian Universitas Sriwijaya, PT Swakarya Adhi Usaha, Koperasi Tiara Sawit Permai, Koperasi Lubai Sawit Permai. 	
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>The company shown policies and declarations related to a code of ethics, recorded in the Golden Agri-Resources Business and Human Rights Policy dated June 2021 which contains:</p> <ol style="list-style-type: none"> 1. Respect workers' rights and dignity in accordance with legal provisions, provide fair treatment without discrimination and build harmonious industrial relations. 2. Respect workers' rights in terms of freedom of opinion, collective bargaining, and forming and joining trade/labor unions. 3. Prevent the practice of forced labor and do not use workers resulting from human trafficking. 	Complied

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		<ol style="list-style-type: none"> 4. Make sure not to employ children in all lines of operations. 5. Ensuring the safety of the work environment and company operations. 6. Recognizing equal rights and participation of women around the operating unit. 7. Create safe and healthy working conditions and provide environmental protection. 8. Respect the rights of local and customary communities according to the applicable laws and regulations where the company operates 9. Respect and protect the rights of whistleblowers and human rights defenders. 10. Comply with legal provisions regarding the prevention of bribery and corruption. 11. Take steps to resolve and restore negative impacts in accordance with applicable laws and regulations where the company operates in the event of a human rights violation. <p>This policy has been disseminated to workers of Bumi Sawit Estate from 16 to 22 February 2024, Bumi Sawit POM on 23 July 2023, for contractor dissemination was carried out on 20 February 2024.</p> <p>Based on interview with estate and mill worker, related agency in Ogan Ilir Regency, and FFB supplier (SBSX), this policy for ethical conduct has been implemented in all business operations and transactions, including recruitment and contracts.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>A comprehensive system for monitoring compliance and implementation of ethical business policies and practices was carried out through the Operational Internal Audit (OIA). The company also showed the</p>	Complied

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		<p>mechanism in implementation The company's policy as state on the agreement that the parties have to be fulfil the existing regulation such as do not employ any child labor, prohibit any corruptions and frauds, and disallowance of forced labor. Based on the interviews with workers in Mill and Estate, they worked in the company wasn't through any agent or labor supplier and there were not any fees during recruitment.</p> <p>The company also showed some SOPs related to monitor the compliance and implementation of ethical business practices, here as follows:</p> <ul style="list-style-type: none"> • Policy of recruitment (KHI-smart/001-1) validated on 01 March 2018 by the Managing Director Human Resource which stated that there was no cost in recruitment process. The company had guaranteed the cost of recruitment if there were any migrant worker. • SOP of handling grievance and dissatisfaction (No. SOP/SMART/SUST/IV/003) last revision on 8 March 2022 which stated that the company guaranteed the freedom of speech by keeping the identity of the employee confidentially. <p>In addition, the company has also shown documented evidence of periodic dissemination related to ethical policies to workers of Bumi Sawit Estate from 16 to 22 February 2024, Bumi Sawit POM on 23 July 2023, for contractor dissemination was carried out on 20 February 2024. Based on the management review and internal audit document, there were no violation against the company's ethical codes</p>	
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			

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2.1.1	<p>(C) The unit of certification complies to relevant regulations.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a list of regulations for compliance with the law in each plantation unit and factory which consists of regulations on a regional, national, and international scale in which the list of regulations contains aspects related to company operations such as:</p> <ul style="list-style-type: none"> - Occupational Safety and Health Aspect - Plantation Aspect - Employment Aspect - Environmental Aspects - Social Aspect <p>The company has also demonstrated the implementation of regulatory compliance in various aspects, here are some examples:</p> <ul style="list-style-type: none"> - The company does not use fire for pest control. - The company does not use pesticides with active ingredients included in WHO Class 1a and 1b also paraquat for pest control. - Employee wages refer to local government wages in 2024. - Have a Collective Labor Agreement that has been registered by the relevant agency. - The workers have been registered in the BPJS program. - Plantation Business Permit based on Decree of Gubernur Sumatera Selatan No. 172/KPT.S/DISBUN/2008 dated 18 March 2008. - Tax Obligation Registered Number (NPWP) on 7 May 2013. - Business Number (NIB) No. 8120314081299 (latest revision on 26 July 2022). - Land Use Title Utilization Report to Land Agency of Muara Enim & Land Agency of Ogan Ilir on 19 June 2024. 	Complied
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing	In order to comply with legality, the company shows “ <i>Daftar Pemenuhan Peraturan Terkait Perizinan</i> ” Documents which was last carried out on	Choose an item.

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	<p>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>January 7, 2023 by the SPO team. The update of the document was carried out referring to the "SOP for Compliance with Regulations and Other Requirements" which was stipulated on July 1, 2014 by the Sustainability Division Head. The procedure explains that every regulation/requirement is always renewed for the legality of its validity which is carried out at least once a year.</p> <p>In the list, the company has also included the latest regulations, for example <i>Kepmenaker 88 Tahun 2023 tentang Pedoman Pencegahan dan Penanganan Kekerasan Seksual di tempat kerja</i>.</p> <p>In addition, the company ensures that its contractors and third parties know and comply with the Sinarmas Agribusiness and Food Business and Human Rights Policy, as shown in Form No. F/SMART/GENERAL/SADV/006/001 on the Contractor Inspection Form. This form is used for inspection of contractors covering aspects that have been determined by the company such as compliance with legality, company procedures and environmental aspects.</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>Procedure of legal boundary stakes monitoring, and maintenance is presented in document No. SOP/SMART/CERS-EHSD/SADV/I/004 dated 1 July 2014. Procedure mentioned that maintenance was carried out by foreman with supervision of Assistant Manager. Monitoring the boundaries of the HGU is done every 3 months.</p> <p>Based on field observations to several samples of HGU stakes determined by the auditors (Pole No. BSP 70, AG 58 and AG 56), it is concluded that all HGU stakes are in place according to their coordinates and are in good condition. Land boundaries with outsiders are clear and there is no indication of land use outside the HGU.</p>	Complied
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			

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2.2.1	A list of contracted parties is available. - Minor compliance -	In 2024, there are contractor of FFB transporter (PT Satrindo Jaya Agropalma), contractor of CPO transporter (PT Mitra Insan Persada), contractor of PK transporter (CV Cipta Maju Mandiri), and contractors of FFB Suppliers (CV Anugerah Agung Amanah and CV Sinar Buah Sejahtera).	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 -	<p>All contracts or statement letters has contained specific clause on meeting relevant legal requirements as follows: Statement Letter Anugerah Agung Amanah signed dated 07 June 2022 and Sinar Buah Sejahtera signed dated 05 August 2023 stated:</p> <ul style="list-style-type: none"> - There will be no acts of corruption, bribery or fraud in the use of funds or other resources. - Do not give or receive money, goods or other forms related to the work agreement. - Comply with the company's business ethics while carrying out work within the scope of the company by being honest, not corrupt, obeying the law and not using drugs. - Respect human rights and do not discriminate, do not carry out forced labor, do not employ under the public and workers who come from human trafficking. - Comply with applicable laws and regulations, such as OHS, environment and worker welfare. <p>FFB transporter on behalf of PT Satrindo Jaya Agropalma, the statement to adhere company's policy stipulated in contractual agreement No. 004/BSP/JKTO-II/XII/2019-ATBS dated 2 December 2019 valid until 31 December 2024. In the contract, has mentioned that the contractor shall adhere the PT BSP policy, such as minimum payment, insurance, and OHS/PPE provision to workers. Moreover, commitment to adhere legal</p>	Complied

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		<p>compliance also stipulated in Statement Letter of PT Satrindo Jaya Agrotama dated 01 February 2021.</p> <p>Sample of payment in May 2024 has been verified, such as for employee ID 13092 and 13086, has been paid amount of IDR 3,464,373 (above minimum wage based on Governor Decree of South Sumatera No. 889/KPTS/DISNAKERTRANS/2023 regarding minimum wage of 2024).</p> <p>List of workers period May 2024 has been shown that all of them are permanent workers, and there is no child labour.</p> <p>Moreover, the workers also have been enrolled in insurance (<i>BPJS Kesehatan</i> and <i>BPJS Ketenagakerjaan</i>). The recent <i>BPJS Kesehatan</i> and <i>BPJS Ketenagakerjaan</i> have been paid on 05 May 2024 respectively for 135 workers.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>As informed in indicators 2.2.2, all contractors have signed Integrity Pact for all contractors, including clause about disallowing child, forced and trafficked labour. The pact declared several clauses related to law obligation:</p> <ul style="list-style-type: none"> - There will be no acts of corruption, bribery or fraud in the use of funds or other resources. - Respect human rights and do not discriminate, do not carry out forced labour, do not employ underage workers and workers who come from human trafficking. - Comply with applicable laws and regulations, such as OHS, environment and worker welfare. <p>Based on interview with contractors, they already know about child worker prohibition, and did not found any indication on field that contractor use child worker or forced labor.</p>	Complied

Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.

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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>Bumi Sawit POM received FFB from certified and uncertified sources as follows:</p> <ul style="list-style-type: none"> • Bumi Sawit Estate – own estate (RSPO certified). • PT Sawit Mas Sejahtera under same parent company – Pendopo Division • PT Anugerah Agung Amanah – PAAX (noncertified). • PT Sinar Buah Sejahtera – SBSX (noncertified). • PSR Muara Enim – PMEA (Independent Smallholders). <p>Through the information above, the directly source only:</p> <ul style="list-style-type: none"> • Bumi Sawit Estate – own estate (RSPO certified). • PT Sawit Mas Sejahtera under same parent company – Pendopo Division <p>All directly source above is under valid land title/HGU.</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>Bumi Sawit POM received FFB from indirectly sources as follows:</p> <ul style="list-style-type: none"> • PT Anugerah Agung Amanah – PAAX (noncertified). • PT Sinar Buah Sejahtera – SBSX (noncertified). • PSR Muara Enim – PMEA (Independent Smallholders). <p>Traceability Department also conducted the due diligence to ensure all the supplier fulfil the legal and certification requirement. This process evidence can be seen on:</p> <ol style="list-style-type: none"> 1. PT Sawit Mas Sejahtera under same parent company – Pendopo Division (RSPO certified but downgraded into noncertified). Engagement based on FFB Processing Agreement between PT Sawit 	OFI

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		<p>Mas Sejahtera with PT Bumi Sawit Permai dated 31 December 2019. Valid until 31 December 2025.</p> <p>2. PT Anugerah Agung Amanah – PAAX (FFB collection centres/agents):</p> <ul style="list-style-type: none"> • Supplier has signed the supplier declaration on document “Surat Pernyataan” on 11 February 2022. • FFB Purchasing Department conducted geolocational mapping in 2020 on potential smallholders that supplied to this agent. Until this assessment found 40 smallholders/supplier (276 Ha). All their plot located in permitted areas. <p>3. PT Sinar Buah Sejahtera – SBSX (FFB collection centres/agents):</p> <ul style="list-style-type: none"> • Supplier has signed the supplier declaration on document “Surat Pernyataan” on 5 August 2023. • FFB Purchasing Department conducted geolocational mapping in 2020 on potential smallholders that supplied to this agent. Until this assessment found 14 smallholders/supplier (336 Ha). All their plot located in permitted areas. <p>4. PSR Muara Enim – PMEA (Independent Smallholders):</p> <ul style="list-style-type: none"> • Unit of certification engaged with Independent Smallholder Cooperation namely Koperasi Jasa Lubai Sawit Permai (Partnership Agreement No. 001/SPK/KOP LSP – BSP/2/2020 dated 14 January 2020). Total areas 939.64 Ha (500 smallholder). • Unit of certification engaged with Independent Smallholder Cooperation namely Koperasi Tiara Sawit Permai (Partnership Agreement No. 001/SPK/KOP TSP – BSP/I/2020 dated 14 January 2020). Total areas 869.88 Ha (240 smallholders). 	
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		OFI: company archiving in presenting indirect supplier data needs to be improved (archiving data).																																											
Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.																																													
Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.																																													
3.1.1	(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	<p>The organization had long term plan on Document business plan for period 2024-2028. The program consists of:</p> <table><tr><td>Description</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>CPO (%)</td><td>20.5</td><td>20.5</td><td>20.5</td><td>20.5</td><td>20.5</td></tr><tr><td>PK (%)</td><td>6</td><td>6</td><td>6</td><td>6</td><td>6</td></tr><tr><td>FFB Production- Main Estate (Ton)</td><td>65,058</td><td>72,291</td><td>57,405</td><td>51,408</td><td>52,304</td></tr><tr><td>FFB Production – Others Supplier</td><td>131,797</td><td>157,134</td><td>154,783</td><td>160,747</td><td>170,564</td></tr><tr><td>CPO (Ton)</td><td>27,018</td><td>32,212</td><td>31,731</td><td>32,953</td><td>34,966</td></tr><tr><td>PK (Ton)</td><td>7,908</td><td>9,428</td><td>9,287</td><td>9,645</td><td>10,234</td></tr></table> <p>The established program considering the inflation, FFB production trend, global CPO price. Some of the parameters estimated include production targets (FFB, CPO & PK), maintenance plans (fertilization, sanitation and</p>	Description	2024	2025	2026	2027	2028	CPO (%)	20.5	20.5	20.5	20.5	20.5	PK (%)	6	6	6	6	6	FFB Production- Main Estate (Ton)	65,058	72,291	57,405	51,408	52,304	FFB Production – Others Supplier	131,797	157,134	154,783	160,747	170,564	CPO (Ton)	27,018	32,212	31,731	32,953	34,966	PK (Ton)	7,908	9,428	9,287	9,645	10,234	Complied
Description	2024	2025	2026	2027	2028																																								
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		others), workforce plans, as well as development plans, price estimates, production cost estimates and other factors.													
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<p>The company has a replanting plan for each management unit. Replanting is carried out by considering plant age, productivity, and plant density. The following are details of replanting projections for the next 5 years:</p> <table><tr><th>Year</th><th>Area (ha)</th></tr><tr><td>2024</td><td>-</td></tr><tr><td>2025</td><td>253</td></tr><tr><td>2026</td><td>577</td></tr><tr><td>2027</td><td>1,121</td></tr><tr><td>2028</td><td>1,058</td></tr></table> <p>The program has been accepted by CFO (Chief Finance Officer) on 18 June 2024.</p>	Year	Area (ha)	2024	-	2025	253	2026	577	2027	1,121	2028	1,058	Complied
Year	Area (ha)														
2024	-														
2025	253														
2026	577														
2027	1,121														
2028	1,058														
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken. - Minor compliance -	The latest management review conducted on 13 May 2024. This management review was attended by Estate Manager, staff and the Sustainability team. The agenda discussed included: review of corrective actions for internal audit findings; ISPO/RSPO/ISCC/OHS assessment results; costumer evaluation; evaluation of performance and productivity.	Complied												
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.															

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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 had program related to continuous improvement for each unit on "Innovation Progress of Bumi Sawit Estate". The innovation made by SPO assistant and known by Unit Manager on 30 June 2024. The innovation program based on productivity aspect, efficiency, and financial aspect. Here's the examples of innovation:</p> <ul style="list-style-type: none"> - GAR Sustainability Information System for GHG data input. - Viber usage for Barn Owl Box construction. - E-Fact Application form work monitoring. <p>This innovation also considered 3 main points of sustainability, namely environment, people, and profit (financial aspect).</p>	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>The company has shown the auditor regarding the RSPO metric template Version 2.1 for the period of 2023/2024 that has been filled in according to the facts and data in the company's record documents. Based on the team auditor's review, the information has been matched with other documents, total planted area, demographic workers, HCV area, FFB productions, work accidents, etc.</p>	Complied
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 company had procedure which covers all activities in operational area, here's the detail:</p> <ul style="list-style-type: none"> • SOP/SMART/MCAR/I/TA-PPA (<i>Perencanaan Penanaman Areal Baru</i>) • SOP/SMART/MCAR/II/TA-PRP (<i>Perencanaan Replanting</i>) • SOP/SMART/MCAR/III/TA-BBT (<i>Pembibitan</i>) • SOP/SMART/MCAR/IV/TA-PLB (<i>Pembukaan Lahan Baru</i>) • SOP/SMART/MCAR/V/TA-TNM (<i>Penanaman</i>) • SOP/SMART/MCAR/VI/TA-RPL (<i>Replanting</i>) 	Complied

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		<ul style="list-style-type: none"> • SOP/SMART/MCAR/VII/TA-HPT (<i>Pengendalian Hama dan Penyakit Tanaman</i>) • SOP/SMART/MCAR/VIII/TA-PGM (<i>Pengendalian Gulma</i>) • SOP/SMART/MCAR/IX/TA-PPK (<i>Pemupukan</i>) • SOP/SMART/MCAR/X/TA-PTB (<i>Pemeliharaan Tanaman Belum Menghasilkan</i>) • SOP/SMART/MCAR/XI/TA-PMP (<i>Persiapan Menjelang Panen</i>) • SOP/SMART/MCAR/XII/TA-PTM (<i>Pemeliharaan Tanaman Menghasilkan</i>) • SOP/SMART/MCAR/XIII/TA-PNN (<i>Panen</i>) • SOP/SMART/MCAR/XIV/TA-PPT (<i>Pemuatan dan Pengangkutan TBS</i>) • SOP/SMART/MCAR/XV/TA-PCH (<i>Pengukuran Curah Hujan dengan Ombrometer</i>) • SOP/SMART/MCMD/I/TM-PKS/Rev.06, Standard Operational Procedure of Palm Oil Process in SMART Group, revision 6 issued by Head Office Jakarta dated 1 Nov 2012. <p>All verified documents have been confirmed to be valid documents (latest revision) and presented in Bahasa Indonesia. The SOP document is available in the Estate and Mill units.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>Unit of certification has had several mechanisms to the check the consistency implementation of procedures in a regular basis. One of them is internal audit and contractor evaluation. For example:</p> <ul style="list-style-type: none"> - OIA (Operational Internal Audit) Report for Bumi Sawit Estate on 14 to 25 March 2024. 	Complied

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		<ul style="list-style-type: none"> - <i>Berita Acara Pemeriksaan Pekerjaan</i> (Minute of Evaluation Work) of contractor (PT Cakra Indo Pratama) on 2 January 2024. <p>The internal audit scope assessment covers all activities on company operational area, from financial aspect, worker welfare and best management practice.</p> <p>For Contractor record, the company evaluate the work results from the volume of productivity, work progress, and quality of results.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>The company has already showed the record of improvement from internal audit assessment in 2024, for examples:</p> <ul style="list-style-type: none"> - Improvement of overtime pay for land application workers. - Improvement of contract worker compensation. <p>The record of improvement action has been stored in each unit operational area.</p>	Complied
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> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Environment Impact Assessment</p> <p>The company already has an environmental permit in the form of an AMDAL document covering a core plantation area of 10,079.90 Ha and a plasma plantation area of 1,500 Ha and a factory capacity of 30 tons of FFB/hour. This AMDAL document has been ratified based on the Decree of the Governor of South Sumatra No. 479/KPT.S/BAPEDALDA/2007 dated 25 July 2007 concerning the Environmental Feasibility of Development of Palm Oil Plantation and</p>	Complied

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		<p>Processing Factory of PT. Bumi Sawit Permai in Rambang Kuang District, Ogan Ilir Regency and Lubai District, Muara Enim Regency.</p> <p>The EIA has been conducted by Pusat Penelitian Lingkungan Hidup Lembaga Penelitian Universitas Sriwijaya and documented in "<i>Analisa Dampak Lingkungan (ANDAL) Kegiatan Pengembangan Perkebunan Dan Pabrik Pengolahan Kelapa Sawit Di Kecamatan Rambang Kuang Kabupaten Ogan Ilir Dan Kecamatan Lubai Kabupaten Muara Enim Luas Kebun Inti 10,079.90 Ha, Luas Kebun Plasma 1,500 Ha, Kapasitas Pabrik 30 ton TBS/Jam 2007</i>".</p> <p>In 2023 there is addition of environmental permit document for 773.39 hectares of uncertified area. This environmental permit is fulfilling the requirement for obtaining HGU (Land use title), therefore can be included in certified area. The chronology of changes to environmental permit documents, namely:</p> <ol style="list-style-type: none"> Letter of Stipulation of Environmental Documents from the Department of Environment and Land Affairs of South Sumatra Province No. 660/2375/DLH/B.I/2021 dated 17 December 2021 in connection with an additional area of 773.39 hectares of core activities. Letter of Stipulation of Environmental Documents from the Department of Environment and Land Affairs of South Sumatra Province No. 660/166/DLH/B.I/2022 dated 30 June 2022 regarding directions for the preparation of an Environmental Evaluation Document with an additional area of 773.39 hectares of core activities and including Prabumulih City as a study area. Approval of Suitability of Space Utilization Activities for Business Activities Number: 29072210211610008 for the requested land area of 609,230,000 m³. This approval document is issued based on Article 181 of Government Regulation Number 5 of 2021 concerning Implementation of Risk-Based Licensing and is valid for 3 years. 	
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		<p>d. Approval of Suitability of Space Utilization Activities for Business Activities Number: 29072210211603004 for the requested land area of 164,140,000 m³. This approval document is issued based on Article 181 of Government Regulation Number 5 of 2021 concerning Implementation of Risk-Based Licensing and is valid for 3 years.</p> <p>e. Decree of the Head of the South Sumatra Provincial Land and Environment Service Number: 136/KPTS/DLHP/2023 dated 23 May 2023 concerning Approval of Environmental Evaluation Documents for Plantation Operational Activities on ± 9,347.34 Ha of Land in Rambang Kuang District, Ogan Ilir Regency, District Lubai and Belida Darat District, Muara Enim Regency and Rambang Kapak Tengah District, Prabumulih City and a Palm Oil Mill with a Capacity of 30 Tons of FFB/Hour in Rambang Kuang District, Ogan Ilir Regency, South Sumatra Province By PT BUMI SAWIT PERMAI. The Environmental Evaluation Document was prepared by PT. Management of Environmental Akhlak Sriwijaya.</p> <p>The documents (EIA, RKL and RPL) were established in according to local requirements and include consultation with relevant stakeholders to identify impact and to develop any mitigation measures. The result of consultation and the mitigation measures were stated at ANDAL Bumi Sawit Mill and Estates have ensured that all activities with significant environmental impacts were managed.</p> <p>Control measures were defined and implemented for ensuring that negative environmental impact was prevented or mitigated. The implementation of those control measures is monitored during monthly environmental patrol and round of internal audits. The evident sighted regarding stakeholder consultations include government and public as the minutes of meeting within the documented of RKL RPL.</p> <p>Document of environmental impact assessment covered:</p> <ul style="list-style-type: none"> • Water resources 	
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		<ul style="list-style-type: none"> • Biological diversity • Air quality • Environment quality • Economic, social and culture • Building new roads, processing mills or other infrastructure; • Putting in drainage or irrigation systems; • Replanting and/or expansion of planting areas; • Management of mill effluents; • Clearing of remaining natural vegetation; • Management of pests and diseases palms by controlled burning; • Result of stakeholder consultation <p>There are no changes in aspects that are managed or monitored even though there is an addendum to the ANDAL document.</p> <p><u>Social Impact Assessment:</u></p> <p>Social Impact Assessment (SIA) was conducted by internal parties (Department Sustainability) in year 2014, documented in SIA report. Process of SIA was described, and the findings documented in SIA Report, positive and negative impact. Assessment was conducted in villages such as Desa Kayu Ara, Desa Tambangan Rambang, Desa Gunung Raja, Desa Jiwa Baru, Desa Tanjung Miring, Desa Tangai.</p> <p>Evidence of participatory action from local communities was also sighted in related SIA documentation including photos. Some aspects were considered during assessment such as:</p> <ul style="list-style-type: none"> • Access and use rights, • Economic livelihoods and working conditions. • Subsistence activities, 	
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		<ul style="list-style-type: none"> • Cultural and religious values, • Health and education facilities, • Other community values. <p>SIA was updated in the Social Monitoring Report 2019 by adding several aspects in accordance with RSPO INANI, as follows:</p> <ul style="list-style-type: none"> • Traditional or customary rights owned by the local community. • Welfare of workers/labour and women, children and vulnerable group <p>Contribution to the local development, including improvement of human resources, local and customary communities.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>The environmental management and monitoring plan includes decreasing water quality and aquatic biota, public health disturbances, public perceptions, drought and fire potential, and air quality. The company has carried out environmental management and monitoring where the documentation of their activities is included in the RKL RPL report which is reported to the competent authority every 6 months. During the audit, a document review was carried out on the RKL RPL report for semester II 2022 and semester I 2023.</p> <p>Several environmental aspects monitored in the RKL RPL document include:</p> <ul style="list-style-type: none"> • Water quality of the Rambang and Lubai rivers (per 6 months) • Quality of water from nearby wells (per 6 months) • Waste water quality (per month) • Indoor noise (in the process area) (per 6 months) • Decreased air quality (per 6 months) • Community employment and income opportunities (once a year) • Anxiety, health, and public perception (once a year) 	Complied

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		<ul style="list-style-type: none"> • Drought and fire potential (monthly patrols) <p>The reporting of RKL - RPL was conducted every semester that consist of analysis of wheel quality, noise quality, waste water quality and flow rate, surface water quality, the air emissions measured by third party, and social aspect. Documents of RKL RPL was sighted and reviewed such as:</p> <ul style="list-style-type: none"> • KLHK's SIMPEL electronic receipt No. 1709518653-2046 on behalf of PT. Bumi Sawit Permai for SEIA monitoring report for the period July to December 2023, printed date 4 March 2024. • SEIA monitoring report receipt No. 039/EM-BSWE/II/2024 to Environmental Agency of Muara Enim Regency date 22 February 2024 (received 8 March 2024). • SEIA monitoring report receipt No. 043/EM-BSWE/II/2024 to Environmental Agency of Ogan Ilir Regency date 22 February 2024 (received 23 February 2024). <p><u>Social Impact Assessment</u></p> <p>In accordance with SOP <i>Pengelolaan dan Pemantauan Dampak Sosial</i> No SOP/SMART/SIGS-CSR/SADV/I/002 dated 1 July 2014, review of Social Impact Assessment conducted once in every 2 years. The last review was period 2020 – 2022 was done in December 2022. Next review approximately in December 2024.</p> <p>There are five (5) villages in Kecamatan Rambang Kuang and two (2) villages in Kecamatan Lubai, taken as target or priority for social impact assessment.</p> <p>Aspect that being monitored are:</p> <ul style="list-style-type: none"> • Water quality 	
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		<ul style="list-style-type: none"> • Manpower or labour recruitment • FFB transportation causes dust • PSR program • Local communities' development <p>Generally public perception was positive regarding the company presence and contribution to the surrounding community. Records of consultation such as attendance list, documentation/photos and list of questions has been reviewed.</p> <p>Focus Group Discussion related to social impact monitoring was held in October 2023 with participated by community leader. Record of FGD as follows:</p> <ul style="list-style-type: none"> • Tuesday, 3 October 2023 located in Sukananti Village with 6 participants. • Tuesday, 3 October 2023 located in Tambang Rambang Village with 3 participants. • Tuesday, 3 October 2023 located in Jiwa Baru Village with 3 participants. • Tuesday, 3 October 2023 located in Gunung Raja Village with 3 participants. • Wednesday, 4 October 2023 located in Kayu Ara Village with 3 participants. • Wednesday, 4 October 2023 located in Tanjung Miring Village with 3 participants. • Wednesday, 4 October 2023 located in Tangai Village with 3 participants. • Wednesday, 4 October 2023 located in employee's housing complex (BSWE and BSWM) with 5 participants. 	
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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>There are no changes in compliance statement compared to last year. Updated data and information regarding environment analysis has been made.</p> <p>Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Bumi Sawit Permai. All environment analysis in 2023-2024 now was conducted by PT. Mutu Agung Lestari Testing Laboratory, except for wastewater quality and soil quality in land application. Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. Data verified during audit:</p> <ul style="list-style-type: none"> • Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester. • Air emission quality • Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Perfomed by wastewater quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. • Wastewater quality monitoring analyse by UPTD Laboratorium Lingkungan Dinas Lingkungan Hidup dan Pertanahan Pemerintah Provinsi Sumatra Selatan. Wastewater analysis result in period July – December 2023 shown comply with regulation KepMENLH No. 28 tahun 2003. • Surface water quality test (upstream and downstream Rambang River and Lubai River). The analysis result in period July – December 2023 	Complied
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		<p>shown comply with regulation PP RI No. 82/2001 (before 2021) and PP RI No. 22/2021.</p> <ul style="list-style-type: none"> • Groundwater analysis conduct annually and the last in Semester 2/2023 shown comply with the regulation Permenkes RI No 32/2017. • Erosion and sedimentation monitoring performed by erosion measurement according to USLE method. Measurement result in period July – December 2023 shown erosion level average below 6 ton/ha/year categorized as very good criteria. • Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area each month. Monitoring result in period July – December 2023 shown that there were species of mammal presence (<i>Macaca fascicularis</i>, <i>Macaca nemestrina</i>, <i>Calosciurus notatus</i>, <i>Sus crofa</i>, <i>Rattus sp</i>, <i>Felis bengalensis</i>, <i>Paradoxurus sp</i>), 13 species of birds (such as: <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Centropus bengalensis</i>, <i>Pycnonotus aurigaster</i>), 4 species of reptile (<i>Varanus salvator</i>, <i>fejevarya sp</i>, <i>Mabouya sp</i>, <i>Denrelaphis caudolineatus</i>). • Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in October 2023, through group discussion. <p>All management and monitoring plan has been implemented well by company according to RKL-RPL document. The implementation report has been reviewed and reported to government agency per semester (six monthly).</p>	
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		<p>During document verification and interview with management, it can be demonstrated that all the environmental monitoring plan has been implemented as per document RKL-RPL. The evaluation of environmental monitoring plan effectivity has been carried out and presented in RKL-RPL report semester 2/2023.</p> <p>Evaluation consists of:</p> <ul style="list-style-type: none"> • Trend evaluation of air ambient quality, air emission, odor, ground water quality, waste water quality, surface water quality, soil erosion shown that the result of monitoring is all parameter is met with the standard of regulation. Trend evaluation of water usage still under the budget/standard; biodiversity trend evaluation shown that there were still found the presence of animal including protected animal; Social economic trend evaluation shown increasing each year. Overall, the trend evaluation shown the consistency and increasing in environmental performance. • Critical evaluation, the critical point in environmental monitoring is wastewater quality and surface water usage. Based on the result of monitoring shown that waste water quality since July – December 2023 was met with regulation (BOD < 5,000 mg/l and pH 6 – 9). • Compliance evaluation to regulation. According to evaluation of impact against soil erosion, water quality, soil quality, air quality, biodiversity, surrounding social and economic, health and safety, indicated that PT Bumi Sawit Permai – Bumi Sawit POM has comply with all relevant regulation. • Public perception monitoring for 2023 has been carried out and there is no negative perception occurred. The next public perception monitoring will be conduct in end of 2024. <p>Last environmental analysis, for period July – December 2024 has been carried out:</p>	
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		<ul style="list-style-type: none"> Clean water analysis on 26 September 2023. Wastewater analysis for December 2022 has been carried out on 8 May 2024. <p>Water analysis in Hulu Sungai Rambang on 9 October 2023.</p>	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p>	<p>The company already procedures for recruitment, selection, hiring, promotion, retirement and termination.</p> <p>Recruitment process</p> <p>Recruitment process has been set in SOP of Recruitment No. PSD A-004-00, dated 1 September 2005. Moreover, it also has been set in the Collective Labor Agreement (PKB) period of 2022 to 2024 Article 7.</p> <p>Employees who have been determined to pass the selection, will follow a probationary period of 3 months, and will be assessed for the appointment of permanent employees in accordance with Letter No. 178/EAS/HRD/09/00, September 1, 2000.</p> <p>Selection process</p> <p>Selection process has been arranged in Circulate Letter No 113/HR PSM2/05/2015 dated 1 April 2015, that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness.</p> <p>Promotion and Career Development</p> <p>Employee performance appraisal and career development refers to the Decree concerning Employee Career Development (No. 178/EAS/HRD/09/00, dated September 1, 2000). Parameters for promotion of groups and positions, among others, are related to years of service, minimum age for each position and class and assessment of superiors. Employee performance appraisal is conducted annually.</p>	Complied

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		<p>The recruitment, selection, hiring, promotion, retirement and termination is also regulated in the <i>Perjanjian Kerja Bersama</i> period of 2022 to 2024, generally described these procedures as follows:</p> <ul style="list-style-type: none"> • Recruitment of workers is based on the company's needs. • The minimum age of workers is 18 years old. • The workers who have been accepted will through three months of probation. • Promotion of workers is based on needs, period of work, expertise, and assessment of workers for the last 6 months. • The company is authorized to carry out the placement, transfer, and promotion of workers by applicable regulations. • Any termination of employment must be carried out in accordance with the laws and regulations. <p>Based on interviews with BSWE workers (harvesters, pesticide sprayers) and BSWM workers (boilerman and engine room operators), the workers had a sufficient understanding of the procedures related to recruitment, promotion, and termination of employment.</p>	
3.5.2	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>Sample implementation of employment procedure as follow:</p> <p>Recruitment</p> <p>In period 2023, there will be employee recruitment at BSWM for several positions, for example driver, clerk, and workshop. Information on employee recruitment is published in villages around the company. The recruitment process is carried out by selecting the completeness of incoming applicants' files, then carrying out a written selection, medical check-up, and determining whether employees will be accepted into the company with contract worker status. The company shows the completeness of the files starting from the recruitment process to the</p>	Complied

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		<p>work agreement between the company and the workers. Sample for new recruitment in October 2023: Nelly Novita Sari (Perjanjian Kerja Waktu Tertentu Nomor 006/BSWM/PKWT/10/2023 as clerk), Kego (Perjanjian Kerja Waktu Tertentu Nomor 008/BSWM/PKWT/10/2023 as workshop worker), and Irfansyah (Perjanjian Kerja Waktu Tertentu Nomor 005/BSWM/PKWT/10/2023 as driver).</p> <p>Promotion</p> <p>Evaluation of employee work performance for the 2023 Permanent Worker period which will be carried out at the beginning of 2024, for example Division 1 BSWE in the name of Jetra Ersu (Harvester) with a total score of 9.1 (Special), Risma Lita (picker) with a total score of 8.3 (Satisfactory). The assessment aspects include discipline, work quantity, work quality, cooperation, work attitude and responsibility.</p> <p>Retirement</p> <p>Pension employee undernamed Rudi Hartono as refer to Mutual Approval of Employment Termination Letter "Perjanjian Bersama Nomor 1348/BSWE-PB/4/2024" dated 16 April 2024. Employee right have been fulfilled by the company, such as pension fund.</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>	<p>The company already has an Occupational Health and Safety Policy. The company's OHS Policy is listed in the Policy on sustainability and business ethics which includes:</p> <ul style="list-style-type: none"> Communicate OHS Management system policies and procedures to all employees and interested parties to ensure that they understand the obligations related to company activities. Comply with all applicable laws, regulations and other provisions regarding OHS. 	Complied

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		<ul style="list-style-type: none">• Ensuring the implementation of the OHS Management System as part of the company's operational activities.• Identify, assess and control hazard risks in every activity in the work environment with a continuous improvement approach to prevent accidents and Occupational Diseases• Manage and monitor OHS Management system indicators and make continuous improvements to improve OHS management performance. <p>The company already has an SOP to conduct risk assessments of all its operations as stated in SOP No. SOP/SMK3/SMART/LH-02 regarding identification of hazard sources, risk assessment and control. The company shows the Identification of Hazard Source and Risk Assessment form for 2024 which was stipulated on 06 January 2024 (BSWE) and 08 January 2024 (BSWM) which describes the Activity, identification of potential hazards (source/event, impact), existing controls, initial risk analysis (level of likelihood, severity, level risk). The identified activities cover all activities in the estate and mill. The company has also evaluated the documents Identification of Environmental Impact Aspects and Material and OHS Risk Analysis taking into account work accidents, the addition of new types of work or the use of new equipment/technology. Based on document review, risk identification and management plans for each operational activity (plantation and factory) are carried out by competent officers so that they can be implemented in field activities. The risk assessment and action plan are reviewed when an accident occurs with the aim of preventing its recurrence.</p> <p>The results of the risk analysis will be carried out using several methods and disseminated to workers through exposure from officers in the field (foreman and assistant) as well as through posting warnings in work</p>	
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		<p>units so that workers always work with safe work techniques such as warnings on PPE discipline, risk of toxic materials, noise areas and so on.</p> <p>The company has also prepared the mitigation plans and procedures are documented and implemented in the OHS Annual Program for mill and estate, where evidence and the records and monitoring form were maintained. Several programs intended to improve OHS performance among others:</p> <ul style="list-style-type: none"> • Evaluation of the fulfilment of OHS related regulations • Distribution, monitoring, and inspection of PPE usage. • Monitoring and distribution of first aid kits • Periodic and special health checks • Monitoring the validity of competency certificates, equipment licenses, • Preparation of work accident report recap • Investigation of work accidents • Emergency response preparedness (KTD) • Contractor inspection and evaluation • P2K3 meeting • First aid training <p>Based on interviews with sample worker in estate and mil, it can be concluded that the workers understand the policy and programs regarding OHS and it is recognized that every morning call is reaffirmed regarding the importance of OHS and the use of PPE in Work.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The effectiveness of the OHS Program period 2023/2024 to address health and safety risks have been monitored in the form of:</p> <ul style="list-style-type: none"> - Monthly OHS Committee meeting, to discuss and address current 	Complied

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		<p>OHS issues, for example, the OHS Committee BSWM meeting on 6 March 2024 and the OHS Committee BSWE meeting on 30 March 2024 which were attended by OHS Committee member and discussed OHS issues, for example regarding the condition of hydrant in Tippler Station at BSWM, follow up on inspection results of PPE and first aid kits at BSWE.</p> <ul style="list-style-type: none"> - Documentation of accident record and the calculation of LTA. - Trimester OHS Report, that has been submitted regularly to Labor Agency. P2K3 report BSWM for the period January – March 2024 was reported on 23 April 2024 (Letter Number 111/SMK3/BSWM/4/2023) and BSWE was reported on 15 April 2024 (Letter Number 073/SMK3/BSWE/4IV2023) to the Manpower and Transmigration Agency of Sumatera Selatan Province - Annual review of HIRAC, on 06 January 2024 (BSWE) and 08 January 2024 (BSWM) - Annual Review of OHS Program. - Internal audit 	
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> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The company has had an annual training program in each unit based on training need analysis matrix that submitted by SPO Officer (refer to document F/SMART/UMUM/SADV/003/001). Those programs covered training aspect of P&C for internal employee, contractors, governmental, women-specific need.</p> <p>Training program of 2024 BSWE such as:</p> <ul style="list-style-type: none"> • Training Leaf Sampling Unit (LSU) and Soil Sampling Unit (SSU) is scheduled for February 2024. • Training HCV is scheduled for March 2024. • Fire Drill is scheduled for April 2024. 	Complied

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		<ul style="list-style-type: none"> • Training Best Management Practice (Spraying, IPM, Manuring) is scheduled for November 2024. • Training environment aspect is scheduled for December 2024. <p>Training program of 2024 BSWM such as:</p> <ul style="list-style-type: none"> • Refreshment Training of RSPO, ISPO, SCCS, ISCC is scheduled for March 2024. • First aid training is scheduled for June 2024 <p>Hydrant and fire extinguisher is scheduled for June 2024</p>	
3.7.2	Records of training are maintained, where appropriate on an individual basis. - Minor compliance -	<p>The company shown records of training conducted BSWM and BSWE for 2024 period, for example:</p> <p>BSWE</p> <ul style="list-style-type: none"> • Training Leaf Sampling Unit (LSU) and Soil Sampling Unit (SSU) on 23 February 2024 • Training HCV on 04 March 2024. • Fire drill on 26 April 2024 • Dissemination of PPE management on 15 January 2024. <p>BSWM</p> <ul style="list-style-type: none"> • First aid training on 26 June 2024 • Hydrant and fire extinguisher training on 26 June 2024 • RSPO, ISPO, SCCS, ISCC refreshment training on 25 March 2024 <p>Dissemination of hazardous waste handling on 21 March 2024</p>	Complied
3.7.3	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>The company shown Training Program 2024, that include Refresh Training Sustainable Palm Oil – ISCC, RSPO, RSPO SCCS, ISPO, CCP Traceability is scheduled for March 2024.</p>	Complied

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	- Minor compliance -	<p>The latest training of RSPO Supply Chain Certification conducted on 25 March and 04 April 2024. Attendance list, training material and photograph are available. Training attended by weighbridge operator, security, clerk of production, grading and despatch operator.</p> <p>Training SCCS for transporter of CPO (PT Mitra Insan Persada) and Transporter PK (CV Cipta Maju Mandiri) has been conducted on 19 June 2024.</p> <p>Interviewed with weighbridge operators, stated has joined "Refresh Training RSPO SCCS in April 2024.</p> <p>Based on explanation conclude appropriate training has been provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS), such as receiving station, weighing station, administration (record keeper). Training is specific and relevant to the task(s) performed.</p>	
Criteria 3.8: Supply chain requirements for mills. 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)			
3.8.1	Identity Preserved Module 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. 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	Bumi Sawit POM received FFB from certified and uncertified sources as follows: <ul style="list-style-type: none"> • Bumi Sawit Estate – own estate (RSPO certified). • PT Sawit Mas Sejahtera under same parent company – Pendopo Division • PT Anugerah Agung Amanah – PAAX (noncertified). • PT Sinar Buah Sejahtera – SBSX (noncertified). • PSR Muara Enim – PMEA (Independent Smallholders): 	Not Applicable

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	without physically separating them, then only Mass Balance Module is applicable.	Based on fact above, Bumi Sawit POM using Mass Balance Module.	
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>Unit of certification using Mass Balance Module due to received FFB from RSPO certified and uncertified sources as follows:</p> <ul style="list-style-type: none"> • Bumi Sawit Estate – own estate (RSPO certified). • PT Sawit Mas Sejahtera under same parent company – Pendopo Division • PT Anugerah Agung Amanah – PAAX (noncertified). • PT Sinar Buah Sejahtera – SBSX (noncertified). <p>PSR Muara Enim – PMEA (Independent Smallholders):</p>	Complied
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: 86,103.71 MT • CPO: 17,651.26 MT <p>PK: 5,166.22 MT</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.	<p>Unit of certification has registered in RSPO IT Platform.</p> <ul style="list-style-type: none"> • RSPO Membership Number: 1-0096-11-000-00 (Golden Agri Resources Ltd) • Member name: PT Bumi Sawit Permai – Bumi Sawit Mill <p>PalmTrace Member ID: RSPO_PO100000611</p>	Complied
3.8.5	Documented procedures	The unit of certification has written procedure and work instruction to ensure the implementation of all elements specified in these requirements, e.g:	Complied

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	<p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<ul style="list-style-type: none"> a) PT Bumi Sawit Permai – Bumi Sawit POM refers to procedure "SOP Supply Chain Produk Bersertifikat Model Mass Balance No. PT.BSP-BSWM/SOP/SCCS-MB/26 rev.09", dated 4 January 2023. 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. b) PT Bumi Sawit Permai – Bumi Sawit POM 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. Sample seen: training record RSPO SCC dated 23 June 2023. Training attended by 15 personnel of process; 9 personnel of grading and Lab; 9 personnel of workshop; 5 office personnel; 7 security and weighbridge personnel; 14 contractors (CPO & PK transporter). c) As per Procedure Supply Chain Certification Mass Balance (PT.BSP-BSWM/SOP/SCCS-MB/26 rev.09), dated 4 January 2023 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 the PIC as Traceability Officer, namely Sadio (Kasie Administrasi BSWM), based on Decree Letter No. 002/FM-BSWM/II/2023 dated 1 February 2023. <p>The Procedure Supply Chain Certification Mass Balance (PT.BSP-BSWM/SOP/SCCS-MB/26 rev.09), dated 4 January 2023, Section 6.1 explains the process for FFB receiving, certified FFB and non-certified</p>	
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		FFB recording; Section 6.3 explains the FFB grading and rejection. The mill uses supply chain Mass Balance Module, contamination is 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 18 – 22 March 2024. No noncompliance raised during this assessment. The internal auditor has received training regarding RSPO Supply Chain Certification Standard internally in 2020 and by Checkmark Training in June 2023.</p> <p>Bumi Sawit Mill has held management review annually, the latest Management review was held on 14 May 2024. 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 • Mature upkeep • Others • Preventive and corrective actions • Follow up from previous management review 	Complied

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		<ul style="list-style-type: none"> • 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, Bumi Sawit Mill (RSPO certificate No. RSPO 733461) received FFB from certified and noncertified sources as follows:</p> <ul style="list-style-type: none"> • Bumi Sawit Estate – own estate (RSPO certified). • PT Sawit Mas Sejahtera under same parent company – Pendopo Division • PT Anugerah Agung Amanah – PAAX (noncertified). • PT Sinar Buah Sejahtera – SBSX (noncertified). <p>PT Bumi Sawit Permai – Bumi Sawit POM refers to Procedure Supply Chain Certification Mass Balance (PT.BSP-BSWM/SOP/SCCS-MB/26 rev.09), dated 4 January 2023:</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 Bumi Sawit Permai – Bumi Sawit POM has a list of certified and non-certified oil palm plantation block. The block list was referring to Memorandum Regional Controller Sumsel-1 No.521/RC-Sumsel1/IX/2017 dated 11 September 2017. The database and map of non-certified block in 	Complied

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		<p>Bumi Sawit Estate updated on annual basis and locked in weighbridge system. The FFB from non-certified block in Bumi Sawit Estate will be delivered with FFB delivery docket, which identifying block identity and "NC – Non-certified" marking. Certified area 3,946.63 Ha and non-certified area 1,192.52 Ha. If a block consist of certified and non-certified area, then will be categorized as non-certified area.</p> <p>Non-conforming FFB and non-certified FFB will be downgraded to non-certified FFB.</p> <p>Records of incoming FFB certified source (Bumi Sawit Estate – own estate):</p> <ul style="list-style-type: none"> • FFB Delivery Note "Surat Pengantar Buah" originated from Division 7 Bumi Sawit Estate No. 19281 dated 22 June 2024. Complex 96D43; total bunches 123; Vehicle No. BG 8351 PG. • Weighbridge card E234 BSWM E 06673 No. A00049 009309 originated from Bumi Sawit Estate; Division 07; total bunches 123; 1st weight 7,970 kg; 2nd weight 4,570 kg; 3rd weight 3,400 kg; Delivery Note 2720/TBS/07/24/06/9281; Transporter 3500126 PT Satrindo Jaya Agropalma; Driver Aria Sendika; Clerk Nanik Mulyani. <p>Records of incoming non-certified FFB sampled:</p> <ul style="list-style-type: none"> • FFB Delivery Note "Surat Pengantar Buah" No. 2106/06/tbs PK/29/06/2024 dated 29 June 2024; Originated from PT Sinar Buah Sejahtera – SBSX; Vehicle No. BG 8589 D; Total bunches 344. • Weighbridge card No. A082108 005167 originated from PT Sinar Buah Sejahtera – SBSX; total bunches 344; 1st weight 8,670 kg; 2nd 	
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		<p>weight 3,870 kg; 3rd weight 4,800 kg; Delivery Note SBSX/TBS/02/24/06/2108; Driver Melky; Clerk Heri.</p> <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 palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>PT Bumi Sawit Permai – Bumi Sawit POM refers to Procedure Supply Chain Certification Mass Balance (PT.BSP-BSWM/SOP/SCCS-MB/26 rev.09), dated 4 January 2023. Section 6.7 explains the product sales/dispatch starting from Delivery Order receiving, product dispatch process, weighing, delivery, registration of transaction.</p> <p>Unit of certification has documented the information related to the goods out can be seen on the shipping announcement. Sample taken:</p> <ol style="list-style-type: none"> Transaction code TR-fd8ff750-ea19: <ul style="list-style-type: none"> Delivery order No. 2750112284 dated 31 May 2023; Contact No. DIC/2750/310523/0004; Product: Palm Kernel; Quantity: 150 MT; Buyer: PT Sumber Indah Perkasa – Downstream Lampung; Transporter: CV Cipta Maju Mandiri; Valid date: 3 - 19 June 2023; certification information: RSPO MB RSPO 733461. Weighbridge card No. K222 BSWM G 11780; No. A008002 008250; 1st weight 9,640 kg; 2nd weight 29,940 kg; net weight 20,300 kg; Goods Out: Palm Kernel; Seller Name: PT Bumi Sawit Permai Mill – Bumi Sawit Mill; Buyer name: PT Sumber Indah Perkasa; Contact No. DIC/2750/310523/0004; Delivery Note 2750/KER/LK/23/06/002; Delivery Order 	Complied

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		<p>2750/KER/2750/23/C017; Transporter; 807067 CV Cipta Maju Mandiri; Driver M Aidil/1/CMM/PK/VI/2023; Clerk: Shinsi Karlina.</p> <ul style="list-style-type: none"> Shipping announcement TR-fd8ff750-ea19 Seller: Bumi Sawit Permai Mill – Bumi Sawit Mill; Member ID: RSPO_PO100000611; Seller Contract No: DIC/2750/310523/0004; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: Bumi Sawit Permai Mill – Bumi Sawit Mill; Mill Country: Indonesia; Volume: 145.89 MT; Transport Detail Shipping B/L: 9 June 2023; Transaction ID: TR-fd8ff750-ea19; Status: confirmed; Announced Date: 16 June 2023. Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO1000006557. <p>2. Transaction code TR-1afea1b8-4899:</p> <ul style="list-style-type: none"> Delivery order No. 2750112290 dated 7 June 2023; Contact No. DIC/2750/070623/0004; Product: Palm Kernel; Quantity: 100 MT; Buyer: PT Sumber Indah Perkasa – Downstream Lampung; Transporter: CV Cipta Maju Mandiri; Valid date: 10 – 26 June 2023; Certification information: RSPO MB RSPO 733461. Weighbridge card No. K222 BSWM G 11992; No. A008206 008458; 1st weight 9,070 kg; 2nd weight 29,900 kg; net weight 20,830 kg; Goods Out: Palm Kernel; Seller Name: PT Bumi Sawit Permai Mill – Bumi Sawit Mill; Buyer name: PT Sumber Indah Perkasa; Contact No. DIC/2750/070623/0004; Delivery Note 2750/KER/LK/23/06/009; Delivery Order 2750/KER/2750/23/C018; Transporter; 807067 CV Cipta Maju Mandiri; Driver M Mulkan/1/CMM/PK/VI/2023; Clerk: Shinsi Karlina. Shipping announcement TR-1afea1b8-4899; Seller: Bumi Sawit Permai Mill – Bumi Sawit Mill; Member ID: RSPO_PO100000611; Seller Contract No: DIC/2750/310523/0004; Seller Reference 	
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		<p>Number 4800071628; Buyer reference number 2750/KER/2750/23/C018; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: Bumi Sawit Permai Mill – Bumi Sawit Mill; Mill Country: Indonesia; Volume: 101.95 MT; Transport Detail Shipping B/L: 9 June 2023; Transaction ID: TR-1afea1b8-4899; Status: confirmed; Announced Date: 21 June 2023; Confirmation Date 23 June 2023; Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006557.</p> <p>3. Transaction code TR-94bb0a4b-f0ab:</p> <ul style="list-style-type: none"> • Delivery order No. 2750112357 dated 13 September 2023; Contact No. DIC/2750/130923/0003; Product: Palm Kernel; Quantity: 100 MT; Buyer: PT Sumber Indah Perkasa – Downstream Lampung; Transporter: CV Cipta Maju Mandiri; Valid date: 13 – 18 September 2023; Certification information: RSPO MB RSPO 733461. • Weighbridge card No. P231 BSWM K 07486; No. A015383 015785; 1st weight 9,600 kg; 2nd weight 29,670 kg; net weight 20,070 kg; Goods Out: Palm Kernel; Seller Name: PT Bumi Sawit Permai Mill – Bumi Sawit Mill; Buyer name: PT Sumber Indah Perkasa; Contact No. DIC/2750/130923/0003; Delivery Note 2750/KER/LK/23/09/0033; Delivery Order 2750/KER/2750/23/C036; Transporter; 807067 CV Cipta Maju Mandiri; Driver Ardiansyah/10/CMM/PK/IX/2023; Clerk: Nanik Mulyani. • Shipping announcement TR-94bb0a4b-f0ab; Seller: Bumi Sawit Permai Mill – Bumi Sawit Mill; Member ID: RSPO_PO1000000611; Seller Contract No: DIC/2750/130923/0003; Seller Reference Number 4800073751; Buyer Reference Number 2750/KER/2750/23/C036; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: Bumi Sawit Permai Mill – Bumi Sawit Mill; Mill Country: Indonesia; Volume: 100.38 MT; 	
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		<p>Transport Detail Shipping B/L: 02 October 2023; Transaction ID: TR-94bb0a4b-f0ab; Status: confirmed; Announced Date: 02 October 2023; Confirmation Date 06 October 2023; Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006557.</p> <p>4. Transaction code TR-a3e92e68-f4de:</p> <ul style="list-style-type: none"> • Delivery order No. 2750112360 dated 20 September 2023; Contact No. DIC/2750/200923/0004; Product: Palm Kernel; Quantity: 100 MT; Buyer: PT Sumber Indah Perkasa – Downstream Lampung; Transporter: CV Cipta Maju Mandiri; Valid date: 22 – 29 September 2023; Certification information: RSPO MB RSPO 733461. • Weighbridge card No. P231 BSWM K 09341; No. A015731 016136; 1st weight 9,680 kg; 2nd weight 30,360 kg; net weight 20,680 kg; Goods Out: Palm Kernel; Seller Name: PT Bumi Sawit Permai Mill – Bumi Sawit Mill; Buyer name: PT Sumber Indah Perkasa; Contact No. DIC/2750/200923/0004; Delivery Note 2750/KER/LK/23/09/0037; Delivery Order 2750/KER/2750/23/C037; Transporter; 807067 CV Cipta Maju Mandiri; Driver Bambang Wahyudi/01/CMM/PK/IX/2023; Clerk: Nanik Mulyani. • Shipping announcement TR-a3e92e68-f4de; Seller: Bumi Sawit Permai Mill – Bumi Sawit Mill; Member ID: RSPO_PO1000000611; Seller Contract No: DIC/2750/200923/0004; Seller Reference Number 4800073934; Buyer Reference Number 2750/KER/2750/23/C037; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: Bumi Sawit Permai Mill – Bumi Sawit Mill; Mill Country: Indonesia; Volume: 101.93 MT; Transport Detail Shipping B/L: 02 October 2023; Transaction ID: TR-a3e92e68-f4de; Status: confirmed; Announced Date: 06 October 2023; Confirmation Date 06 October 2023; Buyer 	
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		<p>Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006557.</p> <p>5. Transaction code TR-934318b3-fb66:</p> <ul style="list-style-type: none">• Delivery order No. 2750112497 dated 08 May 2024; Contact No. DIC/2750/080524/0003; Product: Palm Kernel; Quantity: 100 MT; Buyer: PT Sumber Indah Perkasa – Downstream Lampung; Transporter: CV Cipta Maju Mandiri; Valid date: 16 – 18 May 2024; Certification information: RSPO MB RSPO 733461.• Weighbridge card No. E234 BSWM E 02819; No. A006775 006993; 1st weight 9,100 kg; 2nd weight 29,700 kg; net weight 20,600 kg; Goods Out: Palm Kernel; Seller Name: PT Bumi Sawit Permai Mill – Bumi Sawit Mill; Buyer name: PT Sumber Indah Perkasa; Contact No. DIC/2750/080524/0003; Delivery Note 2750/KER/LK/24/05/0011; Delivery Order 2750/KER/2750/24/C016; Transporter; 807067 CV Cipta Maju Mandiri; Driver Herlan/3/CMM/PK/V/2024; Clerk: Shinsi Karlina.• Shipping announcement TR-934318b3-fb66; Seller: Bumi Sawit Permai Mill – Bumi Sawit Mill; Member ID: RSPO_PO1000000611; Seller Contract No: DIC/2750/080524/0003; Seller Reference Number 4800078878; Buyer Reference Number 2750/KER/2750/24/C016; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: Bumi Sawit Permai Mill – Bumi Sawit Mill; Mill Country: Indonesia; Volume: 101.37 MT; Transport Detail Shipping B/L: 24 May 2024; Transaction ID: TR-934318b3-fb66; Status: confirmed; Announced Date: 06 June 2024; Confirmation Date 06 June 2024; Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006557.	
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3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p><i>Unit of certification did not use outsourcing facilities.</i></p> <p>All transaction using selling where buyer taking responsibility to transporting all product from seller storage (FOB Shipping Point).</p>	Complied
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p><i>Unit of certification did not use outsourcing facilities.</i></p> <p>All transaction using selling where buyer taking responsibility to transporting all product from seller storage (FOB Shipping Point).</p>	Complied

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3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	<p><i>Unit of certification did not use outsourcing facilities.</i></p> <p>All transaction using selling where buyer taking responsibility to transporting all product from seller storage (FOB Shipping Point).</p>	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>PT Bumi Sawit Permai – Bumi Sawit POM refers to Procedure Supply Chain Certification Mass Balance (PT.BSP-BSWM/SOP/SCCS-MB/26 rev.09), dated 4 January 2023. The procedure explains all aspects of supply chain and traceability scope in PT Bumi Sawit Permai: 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>Bumi Sawit POM 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 17 June 2022 No. M194 BSWM E 05145 No. A051851 006776; 1st weight 9,240 kg; 2nd weight 29,250 kg; net weight 20,680 kg; Goods Out: Palm Kernel; Seller Name: PT Bumi Sawit Permai Mill – Bumi Sawit Mill; Buyer name: PT Sumber Indah Perkasa; Contact No. DIC/2750/250522/0003; Delivery Note 2750/KER/LK/22/06/0010; Delivery Order 2750/KER/2750/22/C011; Transporter; 807067 CV Cipta Maju Mandiri; Driver Suhardi/06/CMM/PK/V/2022; Clerk: Nanik Mulyani.</p> <p>Daily Production Report 29 June 2024: FFB received month todate is 6,473 MT; CPO produced month todate is 1,224.64 MT; PK produced month todate is 306.95 MT; OER month todate is 19.00%; KER month</p>	Complied

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		<p>today is 4.76%; CPO dispatched month today is 1,151.89 MT; PK dispatched month today is 284.16 MT.</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> <ol style="list-style-type: none"> PT Bumi Sawit Permai – Bumi Sawit POM 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. PT Bumi Sawit Permai – Bumi Sawit POM through mass balance spreadsheet monitors the proportion of certified CPO and certified PK. Based on document review against Bumi Sawit POM mass balance spreadsheet period 2023 - 2024 (to date June 2024), CH has never sold short. <p>For period January to June 2024, FFB processed is 46,310.35 MT (certified 26,349.15 MT and non-certified 19,961.20 MT); CPO produced is 8,973.20 MT (certified 5,175.18 MT and non-certified 3,798.01 MT); PK produced is 2,510.71 MT (certified 1,440.56 MT and non-certified 1,070.14 MT); OER is 19.44%; KER is 5.42%; CPO dispatched is 8,820.03 MT (certified 5,022.21 MT and non-certified 3,797.82 MT); PK dispatched is 2,379.78 MT (certified 1,400.13 MT and non-certified 1,039.30 MT).</p>	
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3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	According to the long-term projection, top management has set the extraction rate for the next 5 years where OER 20.05% and KER 6.00%. Based on daily production report above, the extraction rate (OER/KER) reported and updated in daily basis. Since January – June 2024 is OER is 19.00%; KER is 4.76%. The reason for unachieved target is due to most of area in replanting progress.	Complied																						
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	According to the long-term projection, top management has set the extraction rate for the next 5 years where OER 20.05% and KER 6.00%. Based on daily production report above, the extraction rate (OER/KER) reported and updated in daily basis. Since January – June 2024 is OER is 19.00%; KER is 4.76%. The reason for unachieved target is due to most of area in replanting progress.	Complied																						
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	PT Bumi Sawit Permai – Bumi Sawit Mill uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Bumi Sawit Estate).	Complied																						
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT Bumi Sawit Permai – Bumi Sawit Mill has made shipping announcement inside PalmTrace transaction for period June 2023 – May 2024. Sample seen:</p> <table><tr><th>Transaction ID</th><th>Buyer</th><th>Product</th><th>Supply Chain Model</th><th>Volume*</th><th>Status</th></tr><tr><td>TR-fd8ff750-ea19</td><td rowspan="3">PT Sumber Indah Perkasa</td><td>CSPK</td><td>Mass Balance</td><td>150</td><td>Confirmed</td></tr><tr><td>TR-1afea1b8-4899</td><td>CSPK</td><td>Mass Balance</td><td>100</td><td>Confirmed</td></tr><tr><td>TR-94bb0a4b-f0ab</td><td>CSPK</td><td>Mass Balance</td><td>100</td><td>Confirmed</td></tr></table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume*	Status	TR-fd8ff750-ea19	PT Sumber Indah Perkasa	CSPK	Mass Balance	150	Confirmed	TR-1afea1b8-4899	CSPK	Mass Balance	100	Confirmed	TR-94bb0a4b-f0ab	CSPK	Mass Balance	100	Confirmed	Complied
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		<table><tr><td>TR-a3e92e68-f4de</td><td></td><td>CSPK</td><td>Mass Balance</td><td>100</td><td>Confirmed</td></tr><tr><td>TR-934318b3-fb66</td><td></td><td>CSPK</td><td>Mass Balance</td><td>100</td><td>Confirmed</td></tr></table> <p>PT Bumi Sawit Permai – Bumi Sawit Mill made remove RSPO certified CSPO from their PalmTrace account. For example, transaction ID: ST-TR-0799c7fb-052a for removed 730.51 MT CSPO from certified stock, dated 02 April 2024; Stock removed for CSPO sold as ISCC certified.</p>	TR-a3e92e68-f4de		CSPK	Mass Balance	100	Confirmed	TR-934318b3-fb66		CSPK	Mass Balance	100	Confirmed	
TR-a3e92e68-f4de		CSPK	Mass Balance	100	Confirmed										
TR-934318b3-fb66		CSPK	Mass Balance	100	Confirmed										
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT Bumi Sawit Permai – Bumi Sawit 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 Bumi Sawit Permai – Bumi Sawit POM did not conducted corporate communication. Corporate communication 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												
4.2	<p>In corporate communications, a member is allowed to:</p> <p>A. display its RSPO membership status</p> <p>B. display the RSPO web address (www.rspo.org)</p> <p>C. state that the member supports the work of RSPO</p> <p>D. state the member’s history with regard to RSPO</p> <p>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</p>	<p>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.</p>	Complied												
4.3	<p>Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.</p>	<p>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.</p>	Complied												

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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	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "We are RSPO certified. Ask us for our RSPO certified products." 	On the website, GAR does not use the RSPO corporate logo.	Complied
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> <ol style="list-style-type: none"> i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)." 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. 	Although PT Bumi Sawit Permai – Bumi Sawit POM is a certified member but they does not use RSPO trademark.	Complied

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	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".		
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 Bumi Sawit Permai – Bumi Sawit POM only stated in sales documents, e.g., Sales Contract, Delivery Order and Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK with Mass Balance Module. The communication is mainly of the RSPO certificate number and product description.	Complied
5.1.2	Product-specific communications are voluntary.	PT Bumi Sawit Permai – Bumi Sawit POM product specification communications already stated on shipping information such as FFA rate and product type (CPO or PK).	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	RSPO label is not displayed on product-specific communications.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	PT Bumi Sawit Permai – Bumi Sawit POM does not use any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products	Complied
5.1.5	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	PT Bumi Sawit Permai – Bumi Sawit POM is a palm oil mill implementing RSPO P&C.	Complied

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	<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. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	PT Bumi Sawit Permai – Bumi Sawit POM is a palm oil mill implementing RSPO P&C.	Complied
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	PT Bumi Sawit Permai – Bumi Sawit POM 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. There is no RSPO Label used.	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	PT Bumi Sawit Permai – Bumi Sawit POM stated in sales documents, e.g., Sales Contract, Delivery Order and Weighbridge Ticket that the	Complied

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	supply chain model and certificate number under which the claim is being made.	product they sold is RSPO Certified CPO or PK with Mass Balance Module, and RSPO certified number is available.	
5.2.3	<p>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:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	PT Bumi Sawit Permai – Bumi Sawit POM is a palm oil mill implementing RSPO P&C.	Complied
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 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.	PT Bumi Sawit Permai – Bumi Sawit POM is an RSPO certificate holder with certificate number RSPO 733461, originally issued by BSI Services Malaysia Sdn Bhd on 9 October 2015. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* 	PT Bumi Sawit Permai – Bumi Sawit POM is an RSPO certificate holder with certificate number RSPO 733461, originally issued by BSI Services Malaysia Sdn Bhd on 9 October 2015. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied

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	<ul style="list-style-type: none"> Contains RSPO IP/SG palm oil* Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> RSPO MIXED* Contributes to the production of RSPO certified palm oil* Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Bumi Sawit Permai – Bumi Sawit POM is an RSPO certificate holder with certificate number RSPO 733461, originally issued by BSI Services Malaysia Sdn Bhd on 9 October 2015. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Bumi Sawit Permai – Bumi Sawit POM is an RSPO certificate holder with certificate number RSPO 733461, originally issued by BSI Services Malaysia Sdn Bhd on 9 October 2015. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> RSPO CREDITS* Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Bumi Sawit Permai – Bumi Sawit POM is an RSPO certificate holder with certificate number RSPO 733461, originally issued by BSI Services Malaysia Sdn Bhd on 9 October 2015. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	PT Bumi Sawit Permai – Bumi Sawit POM communication has not stated information about the claimant's RSPO membership status.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	PT Bumi Sawit Permai – Bumi Sawit POM communication has not stated information about the claimant's RSPO membership status.	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	There is no RSPO Label used.	Complied

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

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	<p>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.</p> <ul style="list-style-type: none"> The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	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>There's no revision related to human right policy which has been stipulated by company in the Business Ethic (<i>Etika Bisnis dan hak Asasi Manusia Sinarmas Agri Business and Food</i>) signed by Head of Policy and Compliance Division on 12 December 2019. Stipulated that:</p> <ul style="list-style-type: none"> Respect workers' rights and dignity in accordance with the provisions of law, provide natural treatment without discrimination and build harmonious industrial relations. Respect workers' rights in terms of freedom of opinion, collective bargaining, and forming and joining trade unions / labor unions. Prevent forced labor practices and do not use workers resulting from human trafficking. Ensure not to employ child labor in all lines of operation. Ensuring the safety of the work environment and company operations. Recognize the equal rights and participation of women around the operating unit. Creating a working area that is safe and healthy and provides environmental protection. Respect the rights of local and customary communities in which 	Complied

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		<p>the company operates.</p> <ul style="list-style-type: none"> • Respect and protect the rights of whistleblowers and human rights defenders (HRD). • Comply with legal provisions regarding the prevention of bribery and corruption. • Carry out remedial measures and resolve negative impacts if there are human rights violations through a transparent and legal process. <p>The policy has been disseminated annually to employees through notice boards of company and by direct dissemination. The recent dissemination has conducted for worker in BSWM on 12 February 2024 and BSWE in the 23 July 2023 and 16 to 22 February 2024 in each Division.</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>As informed in GAR of Social and Environmental Policy (GSEP) in 2015, the policy stated, "To refuse the use of confrontation and intimidation in land disputes". Based on field observation on BSWE, there is no indication that unit certification done violence or any form of harassment on company operational area. This is also in line with the results of interviews with surrounding communities and related agencies of Ogan Ilir Regency during a public consultation, which stating that there were no land conflicts in the company's operational area.</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>PT Bumi Sawit Permai subsidiary of Golden Agri Resources Group has had the system to handling complaints and grievances in the <i>SOP Penanganan Pengaduan dan Konflik</i> (SOP/SMART/SUST/IV/003 last revision on 8 March 2022).</p> <ul style="list-style-type: none"> • The purpose of the SOP is to ensure that complaints and conflicts originating from within (internal) and from outside the company 	Complied

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		<p>(external) can be resolved effectively and efficiently by taking into the principles and criteria of sustainable oil palm plantations.</p> <ul style="list-style-type: none"> • The scope of this procedure includes recording of complaints and conflicts, rating, communication, planning, handling, monitoring and reporting of the handling of complaints and conflicts originating from internal and external parties of the company. This procedure also includes handling reports of sexual harassment and acts of violence that occur within the company's operational permits. • In summary, the procedure or mechanism for handling complaints and conflicts is as follows: recording of complaints and conflicts, rating (low, medium, high based on criteria set by the company, for example number of people affected, organizational level, handling level, involvement of external parties), handling plans, approval of handling plans, handling and reports, handling documentation. <p>Other than that, unit of certification also has the mechanism to allow stakeholders reports their concern, fraud, violation or any form of error through the short message, whatsapp or voice note, email, PO Box and mail address.</p> <p>Email: TellUs@sinarmas-agri.com</p> <p>Short message, whatsapp or voice note: 088-1111-8000</p> <p>PO Box: 2220 Mail address: JKP 10222 Jakarta - Indonesia</p> <p>This mechanism has been posted in each division and estate office.</p> <p>Based on the interviews with harvesters, mill operators and the surrounding communities, they had a good understanding of the communication procedures and personnel who served as communicators between the company and the community so that illiterate people can be informed by the related communicators</p>	
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4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	As explained in 4.2.1, the procedure has been understood by all relevant stakeholders. To ensure the procedure understood by affected stakeholders, company has conducted annual socialization of the procedure of communication and complaint handling to relevant stakeholders (Government Agency, Worker Union, FFB Supplier and others). Based on interviews with government agencies, surrounding communities, and workers, it is known that they have understood the person responsible (KTU).	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	The company has procedures related to Grievance mechanism on SOP Grievance and Conflict Management (No. SOP/SMART/SUST/IV/003, Rev. 3 on 8 March 2022). On that agenda, the resolution prioritizes deliberation and other options to include third parties as mediators and other legal consultants. Based grievance logbook record for period 2023 to 2024, there's no grievance record from relevant stakeholders, including representative of surroundings communities.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	The procedure which already informed in indicators 4.2.1 also had mechanism related to option of access to independent legal and technical advice. If no deal achieved, every party might deliver the case to the lawsuits or RSPO complaint panel.	Complied
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 -	The company shows records of the implementation of development around the plantation (CSR) in the CSR Report of PT Bumi Sawit Permai Period 2023, with the following details:	Complied

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		Aspect	Social Activities	Location
		Economy	Catfish Cultivation development	Tangai Village
		Infrastructure	Road repairing	Tangai Village
		Social	Clean Water Transportation for road repairing	Tangai Village
		Social	Independence Day DOnation	Kayu Ara Village
		Health	Katarak Operation Insurance	Kayu Ara Village
		Infrastructure	Road Repairing	Jiwa Baru Village
		Infrastructure	Development of Clean Water Well in Al Hidayah	Gunung Raja Village
		Infrastructure	Donation for Mosque Dvelopment	Sukananti Village
		<p>For creating the social program, the company had procedure in the SOP/SMART/CDES-CSR/SADV/I/001 dated 5 December 2012 which describes the identification of program potential, implementation of work programs of responsibility, and monitoring of the implementation of the responsibilities of plantation business.</p> <p>The CSR program was created based on input from stakeholders which is also included in the latest social impact assessment on August 2023</p>		

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		<p>and will also be a reference in creating the CSR program for the 2024 period.</p> <p>Based on consultation result with Sukananti Village representative, it known that company already improve good relations between the company and the community around the plantations.</p> <p>For Jiwabaru Village, the company has already implemented CSR program in period 2024, for examples the latest one is donation for Village Office equipment in January 2024. The company also had food donation program in July 2024 for Jiwabaru Village.</p>	
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The company has land ownership legality documents in the form of the following documents:</p> <ul style="list-style-type: none"> - HGU No. 1 of 1990 covering an area of 2,536.30 Ha in Tanjung Miring Village, Muara Kuang District, Ogan Komering Ilir Regency (now Ogan Ilir), South Sumatra Province, valid until 31 December 2020, based on Situation Picture No. 03/OKI/1990 dated 20 February 1990 and Decree of the Head of the National Land Agency No. 16/HGU/1990, dated 20 September 1990. In this decree it is stated that the land requested is State Land - HGU No. 1 of 1990 covering an area of 5,043.60 Ha in Tangai Village, Muara Kuang District, Ogan Komering Ilir Regency (now Ogan Ilir), South Sumatra Province, valid until 31 December 2020, based on Situation Picture No. 04/OKI/1990 dated 20 February 1990 and Decree of the Head of the National Land Agency No. 16/HGU/1990, dated 20 September 1990. In this decree it is stated that the land requested is State Land. 	Complied

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		<ul style="list-style-type: none"> - HGU no. 5 of 2009 covering an area of 1,244.00 Ha in the Villages of Suka Merindu, Jiwa Baru and Gunung Raja, Lubai District, Muara Enim Regency, South Sumatra Province, valid until 10 July 2044, based on Measurement Letter No. 88/2009 and Decree of the Head of the National Land Agency of the Republic of Indonesia No. 97/HGU/BPN.RI/2009 dated 10 July 2009. - Plantation Business Registration Letter (SPUP) dated 9 October 2000 No. 95/Mentanhut/VII/2000. - South Sumatra Governor Decree No. 172/KPT.S/DISBUN/2008 dated 18 March 2008 concerning Plantation Business Permits (IUP) in the name of PT. Bumi Palm Permai. <p>Until the surveillance audit is carried out, the extension and/or renewal of the HGU is still in process</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> - Minor compliance - <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> <p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>Based on the results of the latest surveillance audit, there were no changes related to the land legality maps owned by the company, the maps are still the same as the results of the previous year's audit.</p> <p>The latest compensation for previous land owner conducted on 1996, here's the examples of record acquisition:</p> <ul style="list-style-type: none"> - Statement of Relinquishment of Land Rights, stating that for land covering an area of 2,212 Ha located in the Lebu Kuning area, Division 1.1 KKE, Muara Kuang District, Dati II Ogan Komering Ilir Regency, he has released the land to PT Bumi Sawit Permai with compensation amounting to Rp. 331,800,- - Receipt dated 1 May 1996 for payment of compensation for land/planting benefits for growing Gugok covering an area of 	Complied

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	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.	2,212 Ha from PT BSP and received and signed by Solminim bin Bahori. Based on a sample of land compensation documentation, it is known that land acquisition has been carried out according to FPIC. These documents were prepared in the Indonesian language and were also involved and witnessed by community representatives such as the village head and sub-district head. Based on this evidence, it can be concluded that the unit of certification has carried out the obligation to acquire land within the HGU area from the rights and interests of other parties.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Land title map of an appropriate scale showing the recognized legal rights is documented in "Area Statement Map", scale 1:66,405, dated on June 2024. The land title (HGU) certificate of company owned also equipped with map of location with scale 1:20,000 . This map printed by land agency.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements. - Minor compliance -	Based on the results of this latest surveillance audit, there are no changes related to new land acquisitions (no new land acquisitions), the land area is still the same as the previous year's audit results. There is no customary land, or right of use within the company's HGU. As explained in 4.4.2, it is known that the negotiation process for land release has been carried out in a fair, open, and transparent manner and is based on the agreement of both parties without any coercion from either party. The community represents itself in the process. All relevant information regarding land acquisition is available in appropriate forms and languages.	Complied

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4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the results of this latest surveillance audit, there are no changes related to new land acquisitions (no new land acquisitions), the land area is still the same as the previous year's audit results. There is no customary land, or right of use within the company's HGU.</p> <p>As explained in 4.4.2, it is known that the negotiation process for land release has been carried out in a fair, open, and transparent manner and is based on the agreement of both parties without any coercion from either party. The community represents itself in the process.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>Based on the results of interviews with village representative (Jiwabaru and Sukananti Village), it was informed that the company has had a positive impact to the affected village community such as employee recruitment, economic movement, and CSR assistance. The company has also realized several CSR assistances such as road repairs, assistance for repairing places of worship, educational assistance, and others to the communities around the company.</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>As explanation on Indicator 4.4.1, the company has land ownership legality documents in the form of the following documents:</p> <ul style="list-style-type: none"> - HGU No. 1 of 1990 covering an area of 2,536.30 Ha in Tanjung Miring Village, Muara Kuang District, Ogan Komering Ilir Regency (now Ogan Ilir), South Sumatra Province, valid until 31 December 2020, based on Situation Picture No. 03/OKI/1990 dated 20 February 1990 and Decree of the Head of the National Land Agency No. 16/HGU/1990, dated 20 September 1990. In this decree it is stated that the land requested is State Land 	Complied

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		<ul style="list-style-type: none"> - HGU No. 1 of 1990 covering an area of 5,043.60 Ha in Tangai Village, Muara Kuang District, Ogan Komering Ilir Regency (now Ogan Ilir), South Sumatra Province, valid until 31 December 2020, based on Situation Picture No. 04/OKI/1990 dated 20 February 1990 and Decree of the Head of the National Land Agency No. 16/HGU/1990, dated 20 September 1990. In this decree it is stated that the land requested is State Land. - HGU no. 5 of 2009 covering an area of 1,244.00 Ha in the Villages of Suka Merindu, Jiwa Baru and Gunung Raja, Lubai District, Muara Enim Regency, South Sumatra Province, valid until 10 July 2044, based on Measurement Letter No. 88/2009 and Decree of the Head of the National Land Agency of the Republic of Indonesia No. 97/HGU/BPN.RI/2009 dated 10 July 2009. - Plantation Business Registration Letter (SPUP) dated 9 October 2000 No. 95/Mentanhut/VII/2000. - South Sumatra Governor Decree No. 172/KPT.S/DISBUN/2008 dated 18 March 2008 concerning Plantation Business Permits (IUP) in the name of PT. Bumi Palm Permai. 	
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2005.</p> <p>The latest land compensation was carried out in 1996 (as explained in indicators 4.4.2). Based on interview with Jiwabaru and Sukananti Head Village, there's no negative issues related to acquisition.</p>	Complied

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4.5.3	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. - Minor compliance -	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2005.	Complied
4.5.4	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. - Minor compliance -	As a result of interviews with representatives of Sukananti and Jiwabaru Village, local communities do not experience any restrictions regarding access to water and food in the company's operational areas.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	As explained on 3.4.1 and 3.4.2, companies can show evidence of social impact assessment documentation (firstly in 2014) with FPIC approach that has been carried out by involving various key parties, such as representatives of village head, government agencies and also the community around the company.	Complied
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	As explained in indicators 4.5.2, based on the results of interviews with community representatives from Jiwabaru and Sukananti Village, the village officials said that there were no negative issues related to land acquisition in the company area. Land acquisition has been completed with an agreement between the company and the previous landowner	Complied
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2005.	Complied

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	- Minor compliance -		
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Based on stakeholder consultation with Sukananti Village, Jiwabaru Village and Land Agency of Ogan Ilir, there's no issues related to company acquired area with voluntary isolation by communities.	Complied
Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	The company has procedure of Land Compensation, document No. SOP/SMART/SENS-CSR/SADV/I/003 dated 1 July 2014, revision 01 dated 8 November 2017 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on public consultation with Jiwabaru and Sukananti Village Head known that they know about the procedure through the socialization given and they agree with the procedure. Based on auditor observation, this procedure available on each unit and accessible to stakeholders.	Complied
4.6.2	(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. - Critical (Major) compliance -	The procedure which informed in indicators 4.6.1 also described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the company, the purpose is to ensure the area of plantation free from others right.	Complied
4.6.3	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). - Minor compliance -	Based on the results of a review of records of agreements with cooperatives collaborating in the plasma program, there are several farmers from various genders. The agreement was also signed by each land owner without any coercion from any party witnessed by the village administrator.	Complied

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4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p> <p>- Minor compliance -</p>	<p>As explained on indicators 4.4.2, companies can show evidence of land acquisition documentation with FPIC approach that has been carried out in the PT Bumi Sawit Permai HGU area, for example:</p> <ul style="list-style-type: none"> - Statement of Relinquishment of Land Rights, stating that for land covering an area of 2,212 Ha located in the Lebu Kuning area, Division 1.1 KKE, Muara Kuang District, Dati II Ogan Komering Ilir Regency, he has released the land to PT Bumi Sawit Permai with compensation amounting to Rp. 331,800,- - Receipt dated 1 May 1996 for payment of compensation for land/planting benefits for growing Gugok covering an area of 2,212 Ha from PT BSP and received and signed by Solminim bin Bahori - Letter of Acknowledgment of Rights, which explains the ownership of a plot of land with an area of 0.751 Ha located in the Subun Hulu area of Tanjung Miring Village, Muara Kuang District, Dati II Ogan Komering Ilir Regency. The land boundaries are as follows: the western border is Baharudin, the eastern border is Abas, the northern border is Dencik, and the southern border is Dencik. The land has been cultivated since 1994 by planting Gugok, shrubs. The land has no objections/lawsuits, no disputes, is not burdened with other rights and is not in a state of confiscation/case in court. - Statement of Relinquishment of Land Rights, stating that for land covering an area of 0.751 Ha located in the Subun Hulu area, Tanjung Miring Village, Muara Kuang District, Dati II Ogan Komering Ilir Regency, he has released the land to PT Bumi Sawit Permai with compensation amounting to Rp. 101,375,- 	Complied
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		Until the final assessment was carried out there was no area expansion or new planting. This is proven by the results of public consultations with the community.	
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	The company has a procedure in place to identify people and/or community groups entitled to compensation presented in document No. SOP/SMART/SENS-CSR/SADV/I/003 dated 1 July 2014, revision 01 dated 8 November 2017. The procedure is described how to identify people and/or community groups entitled to compensation.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	The company has procedure of Land Compensation, document No. SOP/SMART/SENS-CSR/SADV/I/003 dated 1 July 2014, revision 01 dated 8 November 2017. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on auditor observation, this procedure available on each estate unit and accessible to stakeholders.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. - Minor compliance -	The company can show recapitulation of previous landowners (latest on 1996) who have been compensated. Compensation is only made for the area within HGU areas owned by the company.	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.			

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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>Based on field observations, document review and public consultation with relevant stakeholders (Sukananti and Jiwabaru Villages), there are no issues related to land conflicts.</p> <p>Based on the results of field observations at Bumi Sawit Estate and also a review of the company's operational map documents, there are several areas that have not been compensated by the company within the company's HGU. Head of Village interviewed by the auditor (Sukananti Village) explained that their land was indeed in the company's HGU area but compensation had not been carried out and the community was also unwilling. The landowner also explained that to date there have been no conflicts with the company and there are no obstacles for them to access their land.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>To anticipate conflicts, the company has a Social Conflict Handling SOP (SOP/SMART/SENS-CSR/SADV/I/002, dated July 1, 2014). The procedure is explained related to the stages of conflict resolution including land conflicts such as receiving information, mapping, analyzing, implementing, and handling to monitoring and evaluating follow-up.</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>Based on explanation on relevant stakeholders (Jiwabaru and Sukananti Villages), There are no issues related to land grabbing and land acquisition using intimidation. This is also proven by the results of interviews with Head of Sukananti Village, where their land is in the company's HGU area, but the company has not provided compensation due to the farmers' unwillingness. From the results of field observations in areas that were not willing to be sold to the company (division 6), the auditor did not see any indication of conflict. The boundary between residents' land and the company's land is clearly visible and the company does not block access for land owners to enter and exit its location. For</p>	Complied

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		the future, the company has a plan to release that area from land use title (HGU).	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	The company shows a map regarding the locations of land areas where compensation has not yet been carried out for each unit, this is due to farmers' unwillingness to release land. This is in line with the explanation of interviews with Head of Sukananti village, where their land is in the company's HGU area, but the company has not provided compensation due to the farmers' unwillingness.	Complied
Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance -	<p>The company has a procedure for determining prices for external FFB, namely the FFB Purchase Administration Procedure dated January 9 2012. This procedure only regulates the purchase of FFB from external parties, while for plasma it is regulated in separate regulations. Price negotiations are determined based on the FFB price determination from the local Plantation Service/market price in the area, the volume of FFB sent per day, grading criteria and fines, and the payment system and payment period.</p> <p>For other supplier (beside cooperation), the FFB prices determined by company refer to commercial price and can be changed every time. The FFB payment will be done 2 times a week.</p> <p>Based on interview with FFB supplier (PT Sinar Buah Sejahtera), the price of FFB will be informed to supplier every week. The information of current FFB price also notice on security post near the entrance gate.</p>	Complied

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5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Regarding to FFB pricing, the company had agreement between company and FFB supplier, for examples:</p> <ul style="list-style-type: none"> - Declaration letter of PT Anugerah Agung Amanah on 12 February 2022. - Declaration letter of PT Sinar Buah Sejahtera on 5 August 2023. <p>Specially on clause 3, The FFB prices determined by company refer to commercial price and can be changed every time. The FFB payment will be done 2 times a 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> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>From the results of a review of recorded agreements with smallholder for examples:</p> <ul style="list-style-type: none"> - Declaration letter of PT Anugerah Agung Amanah on 12 February 2022. - Declaration letter of PT Sinar Buah Sejahtera on 5 August 2023. <p>It is known that the seller and buyer agree that the FFB sale and purchase price is in accordance with the commercial price mechanism determined by company.</p>	Complied
5.1.4	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Based on Partnership agreement with Koperasi Jasa Lubai Sawit Permai (31 January 2020) document review, the agreement has included all right and obligation for all parties such as FFB price, agreement period, loans/credit and force majeure. Based on smallholder list of suppliers, there's also representative from smallholder with women gender.</p>	Complied

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5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	<p>The company has a agreement with an external supplier on behalf of PT Sinar Buah Sejahtera (Declaration Letter on 5 August 2023). The document states several things:</p> <ul style="list-style-type: none"> - FFB Grading - FFB Price mechanism - Status of Legality - Payment Process - Prohibition of originating from Protected Forest Areas, stolen proceeds, and other criminal acts. <p>Based on interview with PT Sinar Buah Sejahtera, they already know about the agreement and no complain about it.</p>	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given. - Critical (Major) compliance -	<p>The organization has showed record of FFB payment for all FFB supplier, here's the detail:</p> <ul style="list-style-type: none"> - Invoice of FFB Payment for PT Anugerah Ageng Amanah Period 25-27 March 2024 with total 4,074 kg. - Invoice of FFB Payment for PT Sinar Buah Sejahtera Period 30-31 March 2024 with total 93,239 kg. <p>The invoice record also included proof of payment via Citi Bank (1 week after invoice released). Based interview with PT Sinar Buah Sejahtera, there's no negative issues related to FFB payment.</p>	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis. - Minor compliance -	The company showed latest calibration record from government agency for two weighing equipment in company operational record. Here's the detail:	Complied

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		<ul style="list-style-type: none"> - Calibration Test Result (No. 1126/Disperindag/Bid.Met/V/2024) for Avery Weight Tronix; E.1205; 112850336 with maximum capacity 50,000 kg expired on May 2025. - Calibration Test Result (No. 1127/Disperindag/Bid.Met/V/2024) for Avery Weight Tronix; E.1005; 124750931 with maximum capacity 300 kg expired on May 2025. <p>The results test is "Ratified on recalibration for 2024 based on Indonesian Law No. 2 year 1981."</p> <p>Based on interview results with FFB supplier, there's no negative issues related to weighing equipment in company operational area.</p>	
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>PT Bumi Sawit Permai has been working on developing community partnership gardens through the People's Palm Oil Program (PSR) since 2019. The PSR program is planned for a total of 2,900 ha for five villages (Tambang Rambang, Gunung Raja, Jiwa Baru, Sunur, Suka Merindu). The following are some of the Collaboration records shown:</p> <ul style="list-style-type: none"> - The Scheme Smallholder Work Agreement can be shown in the document "Community Palm Oil Rejuvenation Partnership Agreement No.001/SPK/KOP LSP-BSP/I/2020 dated January 14 2020 between PT. Bumi Sawit Permai with the Lubai Sawit Permai Services Cooperative with a total area of 1,000 ha. - The Scheme Smallholder Work Agreement can be shown in the document "Community Palm Oil Rejuvenation Partnership Agreement No. 001/SPK/KOP TSP-BSP/I/2020 dated January 14 2020 between PT. Bumi Sawit Permai with the Tiara Sawit Permai Services Cooperative with a total area of 1,000 ha. 	Complied

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		<p>Here's the detail of progress planted realization for cooperation partnership:</p> <table><tr><td colspan="3">Cooperation</td><td>Year Planted</td><td>Area (ha)</td></tr><tr><td rowspan="3">Koperasi Permai</td><td rowspan="3">Tiara</td><td rowspan="3">Sawit</td><td>2020 & 2021</td><td>511.09</td></tr><tr><td>2022</td><td>223.32</td></tr><tr><td>2023</td><td>81.32</td></tr><tr><td rowspan="4">Koperasi Permai</td><td rowspan="4">Lubai</td><td rowspan="4">Sawit</td><td>2021 & 2022</td><td>337.39</td></tr><tr><td>2022</td><td>186.32</td></tr><tr><td>2023</td><td>221.57</td></tr><tr><td>2024</td><td>67.44</td></tr></table> <p>Currently, the process of planting land in the smallholder scheme area is still ongoing, where by 2024 are 67.44 ha has been planted in Koperasi Lubai Sawit Permai.</p> <p>Based on the explanation above, it can be concluded that the development of community partnership plantations through the People's Palm Oil Program (PSR) is currently still in the process of fulfilling the obligation to develop plasma/partnerships of at least 20%.</p>	Cooperation			Year Planted	Area (ha)	Koperasi Permai	Tiara	Sawit	2020 & 2021	511.09	2022	223.32	2023	81.32	Koperasi Permai	Lubai	Sawit	2021 & 2022	337.39	2022	186.32	2023	221.57	2024	67.44	
Cooperation			Year Planted	Area (ha)																								
Koperasi Permai	Tiara	Sawit	2020 & 2021	511.09																								
			2022	223.32																								
			2023	81.32																								
Koperasi Permai	Lubai	Sawit	2021 & 2022	337.39																								
			2022	186.32																								
			2023	221.57																								
			2024	67.44																								
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>The company has procedures related to Grievance mechanism on SOP Grievance and Conflict Management (No. SOP/SMART/SUST/IV/003, Rev. 3 on 8 March 2022). On that agenda, the resolution prioritizes deliberation and other options to include third parties as mediators and other legal consultants.</p>	Complied																									

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		Based grievance logbook record for period 2023 to 2024, there's no grievance record from relevant stakeholders, including representative of surroundings communities.	
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Based on interview with management representative stated that the whole smallholders under unit of certification is full managed scheme (all cooperation which informed in indicators 5.1.8) which all activities are controlled and managed by relevant Estates, including the manpower supply.	Complied
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). - Minor compliance -	Based on interview with management representative stated that the whole smallholders under unit of certification is full managed scheme which all activities are controlled and managed by relevant Estates, including the manpower supply.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	As informed in indicators 5.1.8, the organization had partnership program related to scheme smallholders. The agreement, especially on clause 2.d, the requirement of smallholder members include legality, such as SHM, SKT or SKGR. Based on that objective evidences, the organization promote the legality of the smallholder.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The company showed record of conducted spraying training for smallholder on " <i>Training SMARTRI – Semprot, Pemupukan dan PHT</i> " on 8 November 2023 attended by 13 participants including smallholder members of cooperation partner (PSR Muara Enim Plasma).	Complied

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5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p> <p>- Minor compliance -</p>	<p>The organization has conducted regular meeting related to smallholder program on 10 May 2024. The meeting attended by estate manager, coordinator, and other relevant staff. The meeting discuss about scheme smallholder progression and planting program.</p>	Complied
<p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a non-discrimination and equal opportunity policy in place as indicated in the GAR Social and Environmental Policy (GSEP) document which was passed on September 8, 2015. It states that the company provides equal opportunities for all workers and embraces diversity without regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation, or trade union membership and ensure that workers are protected from acts of discrimination at all stages of the employment relationship.</p> <p>This policy is publicly available, and stakeholders can access it upon request. Based on interviews with employees, they are aware of the company's policy of equality and non-discrimination. All employees are considered equal and do not discriminate based on race, religion, gender, caste in rights and obligations according to their level of work</p>	Complied
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>Based on the results of interviews with Labor Agency of Ogan Ilir Regency as well as unions and workers at both the Estate and Mill, it was stated that so far there have been no incidents of discrimination in the company's work environment. In addition, based on a review of the labor list documents as of May 2024, it is known that workers come from various genders, ethnicities and religions, so it can be concluded that there is no discriminatory treatment in the company's operational activities.</p>	Complied

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6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The company shows performance assessment records for the 2023 Permanent Worker period which will be carried out at the beginning of 2024, for example Division 1 BSW in the name of Jetra Ersu (Harvester) with a total score of 9.1 (Special), Risma Lita (picker) with a total score of 8.3 (Satisfactory). The assessment aspects include discipline, work quantity, work quality, cooperation, work attitude and responsibility.</p> <p>Based on interviews with the company's HR staff, information was obtained that the recruitment process for all workers is carried out through the same process where prospective workers must meet requirements in the form of administrative selection (application letter, graduation letter, photocopy of identity and family), psychological test (for certain positions), interviews and health examination results. As explained by worker union, all workers are treated equally in accordance with company regulation including rights of worker as well.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Based on field observation, interviews with the management and workers, it is known that there were no discriminatory in pregnancy testing given by the company. The pregnancy test conducted only to ensure that no pregnant workers in any agrochemical works such as pesticide application and fertilizing activities proven by there was no requirement regarding pregnancy test in recruitment SOP, job hiring announcement, and medical test during recruitment.</p> <p>Based on the interview with women workers in estate, there was no pregnancy test during recruitment process. The pregnancy test only carried out for female workers to make sure that they do not do any agrochemical works when pregnant.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	<p>Gender Committee PT Bumi Sawit Permai update on 29 June 2024, with structure:</p> <p>- Pembina: Regional Controller</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> - Pelindung: Manager - Head of Gender Committee: Wariyah - Pendamping: All Istri Staff BSWE - Wakil Ketua: Fitriwati - Secretary: Dwi Anggraini - Treasure: Luwiyah - Anggota: 10 perwakilan pekerja Perempuan dan laki-laki <p>Program of Gender Committee period 2024, i.e:</p> <ul style="list-style-type: none"> - Dissemination of policy sexual harassment is scheduled for June 2024. - Inspection daycare is scheduled for monthly. - <i>Posyandu</i> is scheduled for monthly. - Meeting of Gender Committee is scheduled for January, April, July and October 2024. <p>Minutes of the Meeting on 20 April 2024 with discussion regarding:</p> <ul style="list-style-type: none"> - Breastfeeding room facilities at the daycare. - The company provides a daycare for workers who have children while working. They can leave their children without any costs. - The company gives permission for women worker to breastfeed their children during working hours. - Women workers who have toddlers can attend posyandu which is held once a month. - The company will provide health education for woman workers and children. 	
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		From the discussions, some have been implemented, for examples the company give permission for women worker to breastfeed their children. this information is in line with workers interview results.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	<p>Regarding to fair payment for the same work scope for examples harvesting activities, the company had policy on "Harvesting Premium System for BSWE" (No Surat Edaran Dept. Agro. PSM 2/SE/02/VIII/2023 dated 05 July 2023). The policy determined harvesting premium based on oil palm trees condition (planting year, heights, seed and land condition). Here's the record of harvesting payment on May 2024 for each unit:</p> <ul style="list-style-type: none"> - Salary Slip for Employee No. 21002 with the position of BSWE Division 1 Harvester worker receiving a basic salary of IDR 3,464.373; harvesting premium IDR 1.847.128; and Rice Allowance IDR 157,500. - April 2024 Salary Slip for Employee No. 14011 with the position of BSWE Division 2 Harvester worker receiving a basic salary of IDR 3,464.373; harvesting premium IDR 809,106; and Rice Allowance IDR 157,500. <p>Based on that record verification, the difference pay for harvesting due to the amount of FFB harvested, while the basic salary is the same for all workers. This information is in line with harvesting interview results in BSWE.</p>	Complied
Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	Governor Decree of South Sumatera No. 889/KPTS/DISNAKERTRANS/2023, 20 November 2023, regarding minimum wage of 2024, amount IDR 3,456,874/month with a standard of 7 hours of work a day or 40 hours of work a week, the minimum wage	Complied

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		<p>applies to workers with a working period of less than 1 year. Valid from 01 January 2024.</p> <p>PT BSP Director Decree No. 311/CEO PSM 2/HR PSM 2/12/2023, dated 21 December 2023, regarding worker wage based on worker structure and level/grade year of 2024, in accordance with Governor Decree. Divided into groups/categories/levels namely PT1 class A5 of Rp. 3,878,373 (highest wage scale), PT4 class T1 of Rp. 3,457,373 (lowest wage scale)</p> <p>Based on verification the Salary Slip for May 2024, for example worker with NIK 15231 and NIK 15222, it is known that the payment of workers' wages for that month is in accordance with the minimum wage set by the government. Apart from the provision of the minimum wage, the company also provides other wages in the form of allowances, <i>premi</i> and other deductions.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>The company already has a <i>Perjanjian Kerja Bersama</i> (PKB) for 2022 to 2024 between PT BSP with union worker. The PKB was registered with the Manpower Agency of Ogan Ilir Regency on 01 September 2022 (Keputusan Kepala Dinas Transmigrasi dan Tenaga Kerja Kabupaten Ogan Ilir Nomor SK/93/TRANSTEK.III/2022). The PKB regulates the rights and obligations of employees, for example, employees' rights in association, hiring workers, wages, working hours, overtime calculation, social security, and rights and obligations other employees. The PKB is written in Indonesian language and workers are understood substance of agreement.</p> <p>For contract worker, the company also had separate agreement in <i>Perjanjian Kerja Waktu Tertentu</i>. For examples:</p> <ul style="list-style-type: none"> - <i>Perjanjian Kerja Waktu Tertentu</i> on behalf of Nelly Novita Sari for BSWM (No. 102/BSWM/PKWT/04/2024 dated 18 April 2024, valid until 17 April 2025. 	Complied

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		<ul style="list-style-type: none"> - <i>Perjanjian Kerja Waktu Tertentu</i> on behalf of Teguh Riansyah for BSWE (Np. 003/BSWE/PKWT-SW/I/202 dated 01 January 2024, valid until 31 January 2024. <p>For all contract worker, the company already submit the report to Labor Agency of Ogan Ilir Regency. The latest report has been sent on 01 January 2024 (Letter Number 560/13/PKWT/TRANSTEK.I/2024 for BSWE) and 25 April 2024 (Letter Number 560/05/PKWT/TRANSTEK.III/2024 for BSWM).</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>The company can show evidence of legal compliance with regular working hours, deductions, overtime, sick leave, vacation entitlements, maternity leave, reasons for termination, notice period before termination, and other employment conditions. For example:</p> <ul style="list-style-type: none"> - Based on verification salary slip of the workers (boilerman and engine room) for May 2024 it is known that the calculation and payment of overtime wages for these workers are in accordance with the provisions stated in the PKB and there are no underpayments or miscalculations and an Overtime Warrant can be shown. - Salary Slip for May 2024, for example worker with NIK 15231 and NIK 15222, it is known that the payment of workers' wages for that month is in accordance with the minimum wage set by the government. Apart from the provision of the minimum wage, the company also provides other wages in the form of allowances, <i>premi</i> and other deductions. - Salary Slip for Employee No. 21002 with the position of BSWE Division 1 Harvester worker receiving a basic salary of IDR 3,464.373; harvesting premium IDR 1.847.128; and Rice Allowance IDR 157,500. 	Complied

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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>Unit of Certification has provided housing facilities on BSWE and BSWM. For example, list of facilities in 2024 including houses, mosque, workers hall, football field, child care, clinic, and school bus. Based on field observation to housing complex of BSWM and BSWE, it was known that all housing on good condition and liveable, there were domestic waste sanitation, and adequate clean water facilities. This is in line with the results of interviews with housing residents who stated that the facilities provided by the certification unit were housing, electricity, clean water availability and school transportation in good condition.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Based on interviews with estate and mill workers, trade unions and gender committees, it's known that workers have no difficulty in getting affordable food and clean water sources because the company has provided cooperatives that sell daily necessities. In addition, workers can buy these needs to the markets around the company's area without any difficulties.</p>	Complied
6.2.6	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p> <p>- Minor compliance -</p>	<p>Currently, Indonesia does not yet have a DLW benchmark, so the company sets employee wages based on the 2024 Province Minimum Wage of IDR 3,456,874 (Governor Decree of South Sumatera No. 889/KPTS/DISNAKERTRANS/2023, 20 November 2023).</p> <p>The company for period 2023 has calculated a living wage using the benefit approach that the company has provided to workers, including job support, rice allowances, facilities (provision of facilities: schools (including school transportation), housing, clean water, polyclinics (health), etc.). The calculation has been made for every grade of worker (PT4, PT3, PT2, PT1).</p> <p>Based on the verification that the determination of living wage has exceeded the minimum wage set by the government and the calculation</p>	Complied

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		is also based on actual and rational prices at the location of the certification unit.	
<p>PROCEDURAL NOTE:</p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on Employee List in Estate and Mill period May 2024, field observation in harvesting and mill process activities, as well as interview with Labor Union, Gender Committee and workers, it is known that there is no casual or temporary workers employed for core work such as in harvesting or mill's processing activities.</p> <p>The company employ temporary workers (PKWT/Perjanjian Kerja Waktu Tertentu) only for non-core work (for example upkeep workers)</p>	Complied
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company has published a statement in local languages recognizing the rights of employees to freedom of association in Company Policy dated 1 December 2014. Organizations understand that workers have the right to argue associate and organize in a labor union. Organization committed to provides opportunities for workers to organize in unions and express an opinion. Commitment covered in the policy is "Respect the right of every employee to form or join trade unions in accordance they want and to bargain collectively."</p>	Complied

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		<p>The policy has been disseminated annually to employees by installing signboard of company policy and by direct dissemination. The recent dissemination has conducted for worker in BSWM on 12 February 2024 and BSWI in the period of February 2024.</p> <p>The company has accommodated employee rights to argued, associate and organize in a trade union. All employees were allowed to form associations and bargain collectively with their employer.</p> <p>The company's labor union is <i>Pengurus Unit Kerja Serikat Pekerja Kimia, Energi dan Pertambangan Serikat Pekerja Seluruh Indonesia</i> PT Bumi Sawit Permai in 2022 to 2025. This was decided in decision letter no. No. 02/SP-SB/TRANSTEKIII/2022 date on 09 November 2022.</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>The management and trade union regularly conducted meetings to discuss issues in the employment. The recent meeting conducted on 07 June 2024, with a discussion of the results of housing inspections to ensure the cleanliness of the company environment and that there are no waste burning activities in housing.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on interview with trace union, it is known that the management does not interfere with the formation or operation of registered labour union. There is no coercion and intervention related to membership and the course of the organization.</p>	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>GAR Social and Environmental Policy to implement policies related to hiring workers in accordance with applicable regulations and has been signed by the Head of Upstream, CEO-Downstream & Commercial, Executive Director & CFO; Managing Director of Sustainability & Strategic Stakeholder Engagement, in 2015. In point 3 Work Environment and Industrial Relations states that companies prohibit the employment of children and take action to prevent the use of child labor</p>	Complied

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		<p>in our activities, besides that there is also a statement of zero tolerance against immoral treatment and harassment. Take corrective action if child labor is found and ensure proper follow-up and provide safety protection assistance.</p> <p>PT. Bumi Sawit Permai referring to Corporate Letter "Surat Edaran Sinar Mas HR Director No.002/SE-HRDV/03/09 Perihal Batasan Usia Minimum", dated 31 March 2009. The letter stipulated "Sehubungan dengan pelaksanaan Undang-undang No.13 Tahun 2003 tentang Ketenagakerjaan pasal 68 mengenai larangan mempekerjakan anak maka dengan ini disampaikan dalam proses penerimaan karyawan ditetapkan batas usia minimum adalah 18 (delapan belas) tahun" – with regards to implementation of Undang-undang No.13 Tahun 2003 tentang Ketenagakerjaan chapter 68 on prohibition employing child worker, it is determined the minimum age for employee recruitment is 18 (eighteen) years old.</p> <p>Dissemination of the prohibition on hiring children on 12 February 2024 for worker in BSWM, and on 16 to 22 February 2024 for worker in BSWE.</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>Based on the verification of the Worker's List document in May 2024, there were no workers who were under 18 years of age at the time of initial recruitment. In addition, there are also no students who are carrying out work practices in company operations. The results of interviews with the Labor Agency of Ogan Ilir Regency and representatives of the trade union found that there were no child workers or workers under the age of 18 working at the company.</p>	Complied
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the verification of the Worker's List document in May 2024, there are no students who are carrying out work practices in company operations.</p>	Complied
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</p>	<p>The company showed the fact of integrity for contractors such as integrity fact of PT Satrindo Jaya Agropalma with contract number</p>	Complied

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	<p>protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>004/BSP/JKTO-II/XII/2019-ATBS valid thru 31 December 2024 stating that: Respect human rights and do not discriminate, do not do forced labor, do not employ underage workers and workers who come from trafficking in persons.</p> <p>In addition, based on the results of interviews with FFB contractors and suppliers, it was conveyed that the parties were aware of the prohibition on work practices involving child labor, forced labor, and workers from human trafficking.</p> <p>Based on the verification of the Worker's List document in May 2024, there were no workers who were under 18 years of age at the time of initial recruitment. In addition, there are also no students who are carrying out work practices in company operations. The results of interviews with the Labor Agency of Ogan Ilir Regency and representatives of the trade union found that there were no child workers or workers under the age of 18 working at the company.</p>	
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a policy to prohibit all forms of sexual harassment and all other forms of harassment which are indicated in the GAR Social and Environmental Policy (GSEP) document. The policy was approved on September 8, 2015, by the Head of Upstream, CEO of Down Stream & Commercial, Executive Director & CFO, and MD of Sustainability & SSE. It is stated that the company does not tolerate acts of sexual harassment and any other forms of harassment and violence.</p> <p>Dissemination on prevention and sexual harassment was carried out 12 February 2024 for worker in BSWM, and on 16 to 22 February 2024 for worker in BSWE.</p> <p>Based on interview with the Gender Committee, it was conveyed that there were no reported incidents of sexual harassment or violence in the last one year.</p>	Complied

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6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Policy to protect women reproduction rights has been also stated in Circulate Letter No 095/CEO2-SE/12/2010 dated 14 December 2010. Menstruation leave are given to female worker for 2 days-off without any salary deduction.</p> <p>PT BSP has issued the Internal Memorandum No 001/MEMO-VPA PSM2/04/2011 date 8 April 2011 concerning pregnant and lactating women workers. It stated that Pregnant and lactating women employee are not allowed to work as a pesticide/herbicide sprayer.</p> <p>Gender committee was established by the organization. The committee has representatives from all areas of work. The committee consider matters such as; trainings on women's rights, counselling for women affected by violence, women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks, and women to be given specific break times to enable effective breastfeeding.</p> <p>Communication to all workers pertinent to prevent sexual harassment and protect women reproduction was conducted by the gender committee team and attended by the organization. The last dissemination was in 12 February 2024 to employee's wife and woman workers.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>The company has identified the need of expectant mother and new mother in a documentation. Based on the document, the needs of new mother that have been identified among others to consult the health of their fetuses and babies, to get proper medical check-up and vitamins, a place and paramedic (nurse and midwife) to give proper birth, daycare/creche, emergency response, etc.</p> <p>Management has fulfilled their need by providing:</p> <ul style="list-style-type: none"> - Clinic including company's doctor and paramedic, for getting regular check-up, consultation and giving birth. 	Complied

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		<ul style="list-style-type: none"> - Monthly 'Posyandu' as an event to check their maternity (fetuses) and babies under 5 years old, to give consultations and vitamins. - Maternity leave: 3 months including before and after giving birth in accordance with legal regulation. - Company's ambulance for emergency responds, to get to nearest hospital. - Daycare/crech. <p>Based on interview with sampled new mothers, audit team noted the medical team has consulted the need for new mother. Then it is prepared in form of maternity check, labour preparation, vaccination program for infants and medical check based on "Kartu Menuju Sehat" for infants and prepare facility for infant day care</p> <p>The company shown questionnaire for assessed the needs of new mothers dated 14 June 2024,</p> <p>The Gender Committee and medical staff can support the assessment of new nursing mothers.</p> <p>The unit of certification provides appropriate opportunities so that mothers can carry out their obligations to provide exclusive breastfeeding (6 months based on Act No. 36 of 2009 concerning Health) or a longer period of time based on the child's needs</p> <p>Adequate lactation space should be provided for nursing mothers who have babies with 24 months of age or younger. Lactation activities should not reduce employee's income.</p>	
6.5.4	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.	The company has had the system to handling complaints and grievances in the <i>SOP Penanganan Pengaduan dan Konflik</i> (SOP/SMART/SUST/IV/003 Rev. 03 dated 14 February 2022). The scope of this procedure includes recording of complaints and conflicts, rating, communication, planning, handling, monitoring and reporting of the	Complied

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	- Minor compliance -	<p>handling of complaints and conflicts originating from internal and external parties of the company. This procedure also includes handling reports of sexual harassment and acts of violence that occur within the company's operational permits. The procedure has set the dispute resolution in an appropriate manner, ensuring the anonymity of complainants, protecting the Human Rights Defenders, community spoke persons, and whistle blowers where requested. The system ensures that there is no risk of reprisal or intimidation to the complainants. If no deal achieved, every party might deliver the case to the lawsuits or RSPO complaint panel.</p> <p>Moreover, the company has formed a Gender Committee as a place to submit grievance related sexual harassment or violation of reproductive rights. Based on interview with Gender Committee and women workers, are known that there is no negative issue related to sexual harassment or violation of reproductive rights in the last one year.</p>	
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>The company shows the Golden Agri-Resources Business and Human Rights Policy document which was legalized in June, 2019, by the Head of Policy and Compliance Division. The policy stated:</p> <ul style="list-style-type: none"> • Preventing force labour practice dan not using workers resulting from human trafficking. • Not using child workers in all operational unit. • Recognize equality and participation of women around operating units. • Respect the rights and dignity of workers in accordance with legal provisions, provide fair treatment without discrimination and build harmonious industrial relations. 	Complied

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		<p>In period 2023, there will be employee recruitment at BSWM for several positions, for example driver, clerk, and workshop. Information on employee recruitment is published in villages around the company. The recruitment process is carried out by selecting the completeness of incoming applicants' files, then carrying out a written selection, medical check-up, and determining whether employees will be accepted into the company with contract worker status. The company shows the completeness of the files starting from the recruitment process to the work agreement between the company and the workers. Sample for new recruitment in October 2023: Nelly Novita Sari (Perjanjian Kerja Waktu Tertentu Nomor 006/BSWM/PKWT/10/2023 as clerk), Kego (Perjanjian Kerja Waktu Tertentu Nomor 008/BSWM/PKWT/10/2023 as workshop worker), and Irfansyah (Perjanjian Kerja Waktu Tertentu Nomor 005/BSWM/PKWT/10/2023 as driver).</p> <p>Based on verification the document show that every worker has a work bond with a company that has clearly regulated their rights and obligations. Implementation of work and overtime work is in accordance with the agreement. There were no issues regarding the withholding of identity documents, withheld wages, payments during the recruitment process and other employment issues</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>Based on document review, field observation and interview with workers and their representative (worker union), contract worker only applied on non-core activities such as upkeep, manuring and herbicide spraying. For all core activities such as harvesting and mill operators, all workers have permanent status.</p> <p>For contract worker, the company also had separate agreement in <i>Perjanjian Kerja Waktu Tertentu</i>. For examples:</p> <ul style="list-style-type: none"> - <i>Perjanjian Kerja Waktu Tertentu</i> on behalf of Nelly Novita Sari for BSWM (No. 102/BSWM/PKWT/04/2024 dated 18 April 2024, valid until 17 April 2025. 	Complied

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		<p>- <i>Perjanjian Kerja Waktu Tertentu</i> on behalf of Teguh Riansyah for BSW (Np. 003/BSWE/PKWT-SW/I/202 dated 01 January 2024, valid until 31 January 2024.</p> <p>The agreement contains right and obligation for contract workers, from jobs type, salary, insurance, to work period.</p>	
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 unit of certification has established a person in charge of Occupational Health and Safety (OHS) which has been approved by the Labor Agency Office, which among other things is explained as follows:</p> <ul style="list-style-type: none"> • <i>Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Sumatera Selatan</i> Nomor 2569/SK/Nakertrans/2023 dated 23 November 2023 regarding Application for Ratification of the Occupational Safety and Health Advisory Committee at the PT Bumi Sawit Permai – Bumi Sawit Mill. OHS Expert on behalf of Fajar Pratama Putra (<i>Kartu Tanda Kewenangan Ahli K3 Umum Nomor. 28272111123/Q-AK3U/16/XI/2023</i> valid until 21 November 2028) • <i>Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Sumatera Selatan</i> Nomor 1679/SK/Nakertrans/2024 dated 10 June 2023 regarding Application for Ratification of the Occupational Safety and Health Advisory Committee at the PT Bumi Sawit Permai – Bumi Sawit Estate. OHS Expert on behalf of Ricky Julian Saputra (<i>Kartu Tanda Kewenangan Ahli K3 Umum Nomor. 3982050623/Q-AK3U/16/VI/2023</i> valid until 05 June 2026). • Monthly OHS Committee meeting, to discuss and address current OHS issues, for example, the OHS Committee BSWM meeting on 6 March 2024 and the OHS Committee BSWE meeting on 30 March 2024 which were attended by OHS Committee member and discussed OHS issues, for example regarding the condition of hydrant in Tippler Station at BSWM, follow up on inspection results 	Complied

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		<p>of PPE and first aid kits at BSWE.</p> <p>OHS Report, that has been submitted regularly to Labor Agency. P2K3 report BSWM for the period January – March 2024 was reported on 23 April 2024 (Letter Number 111/SMK3/BSWM/4/2023) and BSWE was reported on 15 April 2024 (Letter Number 073/SMK3/BSWE/4IV2023) to the Manpower and Transmigration Agency of Sumatera Selatan Province.</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 shows emergency and work accident response procedures which are documented in Indonesian and are listed in:</p> <ul style="list-style-type: none"> • SOP for handling accidents and occupational diseases (SOP/SMART/HESS-EHSD-10). • SOP for Emergency Preparedness and Response (SOP/SMART/General/SADV/I/005). <p>The results of field observations and interviews in the BSWE and BSWM areas revealed that harvest, spray, warehouse and Mill workers could explain OHS procedures, including emergency response procedures, and their procedures were clearly understood by all workers.</p> <p>Interviews with firefighters at BSWE show an understanding of fire prevention and management in the event of a land fire.</p> <p>There are officers assigned to the field and work sites who have received training in first aid in accidents as evidenced by a training certificate. And first aid refreshment training was carried out on 11 January 2024 Based on the results of field observations in the BSWE and BSWM areas, it is known that the first aid kit is in complete condition with a total of 21 items according to regulations and the contents of the first aid kit can be used at any time.</p>	Complied
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine</p>	<p>Unit of certification has shown PPE Matrix Documents for Estate and Mills. The document describes the type of PPE that must be worn for each type of work. For example, in harvesting work, the PPE that must</p>	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>be used is a helmet, goggles, combination gloves, and boots. Based on field observation in BSWE, it is known that workers have used PPE according to company standards. In addition, the worker also explained that if the PPE is damaged, the worker can report it to the foreman to ask for the replacement of the PPE.</p> <p>Based on the results of the field visit to the BSWE, it is known that there is a storage area for PPE and spray equipment as well as sanitation facilities for employees after the spraying work is completed. Based on the results of field visits and interviews with workers, it is known that workers have used PPE completely and company management always monitors workers regularly regarding the use of PPE properly and correctly. The company has also provided PPE in the form of masks, aprons and shoes to workers.</p> <p>Interview with the workers and Labor Union, the PPE has been provided, exchanged regularly or anytime if broken without any charge. The PPE stocks can be seen on material storage.</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>Unit of certification established the company's clinic, as well as its licensed company's doctor and paramedics. All workers including contractor's workers can use this facility. The company has complied legal compliance toward the clinic facilities as follows:</p> <ul style="list-style-type: none"> - Clinic permit based on Decree of Investment and Permit Agency (DPMPTSP) No. 440/OO/DPMPTSP/2019 dated 19 August 2019, valid for 5 years. - dr. Waston Ade Chandra Siregar has been Hiperkes certificate No. 29.161/DH-VII/12, August 2012. - Paramedic (Anggi Oktasari Am.Kep, Agreement from Health Agency No. 440/082/DINKES/SIPP/2019 dated 25 September 2019, valid for 	Complied

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		<p>5 years. has been Hiperkes certificate No. 22.025/DBK3-PM/03/IX/2017, March 2017.</p> <p>The company has registered all employees into work accident insurance, namely employment insurance. This can be proven by paying employment insurance premium every month. It is also verified during interview to the workers and Labor Union. Based on document review, all workers have been registered in the accident insurance.</p> <p>Companies can show recorded proof of payment via bank transfer as well as a list of social security program participants (BPJS Health and BPJS Employment), The following is evidence of payment of BPJS Ketenagakerjaan and BPJS Kesehatan for the example of May and June 2024.</p>	
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>The company has documented Lost Time Accident for 2023 and until May 2024 (including monthly and yearly data) for Mill and Estate. The calculation for frequency rate and severity rate was generated from lost time accident (LTA) data, employee working hour's data and lost time day (LTD) data. The timesheet calculation for each month was shown during audit.</p>	Complied
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Sawit Permai has established SOP for Pests and Diseases Control, that available in the document No. SOP/SMART/MCAR/VII/TA-HPT. The process includes activities in controlling pest detection, census, control recommendations, control, and evaluation. The procedures include setting out of technique to be implemented, chemical to be used, locations to be applied, and time frame for implementation. It was</p>	Complied

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		<p>observed that all IPM program has been performed based on determined schedule.</p> <p>The company also showed record of integrated pest management with early warning system, for examples:</p> <ul style="list-style-type: none">- Barn Owl Box Monitoring for Period 2024 with results 139 mature owl.- Rat census Period January 2024 in Division 2 with average results 0.12% rat attack (below threshold).- Rat census Period January 2024 in Division 3 with average results 0.05% rat attack (below threshold).- Rat census Period January 2024 in Division 7 with average results 0.07% rat attack (below threshold).- Leaf Caterpillar Census Period June 2024 in Division 1 with zero attack.- Leaf Caterpillar Census Period June 2024 in Division 2 with zero attack. <p>The company not conducted census for Ganoderma attack because of no indication of Ganoderma based on early detection from workers in field.</p> <p>Based on field observation, obtained that the company planted host plants/beneficial plants as an early warning system for biological pest control. According to the interview with estate manager sand staff revealed that <i>Turnerea subulate</i> and <i>Antigonon leptosus</i> were planted on the side of the road in each block.</p>	
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7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>There is some species that listed in Global Invasive Species existed and planted for IPM plan. For example, <i>Antigonon leptosus</i>. The spreading is controlled manually and chemically.</p> <p>Until this assessment, there is no outbreak of invasive species.</p>	Complied																					
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on field visit, interview and document review, there is no use of fire for pest control in whole area of Bumi Sawit Estate. This is inline with stakeholder consultation results with Sukananti Village and Jiwabaru Village.</p>	Complied																					
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																								
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The company shows records of the list of pesticides used along with justification for their use, consisting of herbicides, insecticides, fungicides, acaricides and rodenticides. Following is some information on the pesticide brands used by the company:</p> <table><tr><td>Name</td><td>Active Ingredients</td><td>Justification</td></tr><tr><td>Erkafuron 20 WG</td><td>Methyl Metsulfuron</td><td>Herbicide</td></tr><tr><td>Rollup 480 SL</td><td>Glyphosate</td><td>Herbicide</td></tr><tr><td>Garlon Mix 333</td><td>Triclopyr</td><td>Herbicide</td></tr><tr><td>Starane 480 EC</td><td>Fluroxypir</td><td>Herbicide</td></tr><tr><td>Decis 25 EC</td><td>Deltametrin</td><td>Insecticide</td></tr><tr><td>Benlox 50 WP</td><td>Benomil</td><td>Fungicide</td></tr></table>	Name	Active Ingredients	Justification	Erkafuron 20 WG	Methyl Metsulfuron	Herbicide	Rollup 480 SL	Glyphosate	Herbicide	Garlon Mix 333	Triclopyr	Herbicide	Starane 480 EC	Fluroxypir	Herbicide	Decis 25 EC	Deltametrin	Insecticide	Benlox 50 WP	Benomil	Fungicide	Complied
Name	Active Ingredients	Justification																						
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Starane 480 EC	Fluroxypir	Herbicide																						
Decis 25 EC	Deltametrin	Insecticide																						
Benlox 50 WP	Benomil	Fungicide																						

		The results of field observation on Bumi Sawit Estate and interviews with pesticide applicators showed that all pesticide applicators had understood the procedures for spraying and proper use of spray equipment, targeting weeds, prohibiting spraying in river border areas and the actions taken when poisoning occurs in the area.																													
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>The company has records related to pesticide use in the document "".</p> <p>In this document, the company records pesticide use starting from total solution use, total active ingredients, total active ingredients per area and total active ingredients per production. Here are some recording notes for management units:</p> <table border="1"> <thead> <tr> <th>Name</th><th>Total Application</th><th>Total Active Ingredient</th><th>Total Area Application (per hectare)</th></tr> </thead> <tbody> <tr> <td>Erkafuron 20 WG</td><td>397.58</td><td>79.52 kg</td><td>30,583.08</td></tr> <tr> <td>Rollup 480 SL</td><td>4,844.97</td><td>2,325.59 L</td><td>19,379.88</td></tr> <tr> <td>Garlon Mix 333</td><td>1,080.00</td><td>359.64 L</td><td>18,000.00</td></tr> <tr> <td>Starane 480 EC</td><td>488.51</td><td>234.48 L</td><td>3,908.07</td></tr> <tr> <td>Decis 25 EC</td><td>118.34</td><td>29.59 L</td><td>1,972.33</td></tr> <tr> <td>Benlox 50 WP</td><td>19.88</td><td>9.94 kg</td><td>331.33</td></tr> </tbody> </table> <p>The document for each estate describes the type of pesticide, the active ingredient, LD50, active ingredient content, amount of pesticide used, area of pesticide use, and pesticide use per hectare.</p>	Name	Total Application	Total Active Ingredient	Total Area Application (per hectare)	Erkafuron 20 WG	397.58	79.52 kg	30,583.08	Rollup 480 SL	4,844.97	2,325.59 L	19,379.88	Garlon Mix 333	1,080.00	359.64 L	18,000.00	Starane 480 EC	488.51	234.48 L	3,908.07	Decis 25 EC	118.34	29.59 L	1,972.33	Benlox 50 WP	19.88	9.94 kg	331.33	Complied
Name	Total Application	Total Active Ingredient	Total Area Application (per hectare)																												
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Benlox 50 WP	19.88	9.94 kg	331.33																												

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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The company shows evidence of a usage comparison in pesticide use for estate each year. Here are some examples:</p> <table><tr><td>Pesticide Name</td><td>2022</td><td>2023</td></tr><tr><td>Erkafuron</td><td>343.49 litter</td><td>397.58 litter</td></tr><tr><td>Rollup</td><td>3,514.10 litter</td><td>4,844.97 litter</td></tr></table> <p>Based on field observation, the increase of herbicide usage because of immature plant upkeep (replanting activities).</p> <p>In addition, for insecticide use, the company only uses it if the pest attack census results have passed the threshold. Insecticides are not used as a preventive measure.</p>	Pesticide Name	2022	2023	Erkafuron	343.49 litter	397.58 litter	Rollup	3,514.10 litter	4,844.97 litter	Complied
Pesticide Name	2022	2023										
Erkafuron	343.49 litter	397.58 litter										
Rollup	3,514.10 litter	4,844.97 litter										
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>In the context of integrated pest control, the company has related procedures in:</p> <ul style="list-style-type: none">SOP/SMART/MCAR/VII/TA-HPT (<i>Pengendalian Hama dan Penyakit Tanaman</i>)SOP/SMART/MCAR/VIII/TA-PGM (<i>Pengendalian Gulma</i>) <p>In this procedure, the company establishes an early warning system in carrying out control actions. The company also prioritizes biological control by planting useful plants. Chemical action is only carried out if the census results exceed the threshold. Based on this evidence, the company does not carry out pest control by preventive means (prophylactic).</p>	Complied									

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		The use of pesticides is always based on the needs and field conditions. Based on the results of field observation and interviews with spraying workers, workers explained that spraying was carried out selectively.																						
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>In line with the explanation in indicator 7.2.1, the company shows a recorded list of pesticides used in operational areas, as follows:</p> <table><tr><td>Name</td><td>Active Ingredients</td><td>Class</td></tr><tr><td>Erkafuron 20 WG</td><td>Methyl Metsulfuron</td><td>U (unlikely)</td></tr><tr><td>Rollup 480 SL</td><td>Glyphosate</td><td>III</td></tr><tr><td>Garlon Mix 333</td><td>Triclopyr</td><td>II</td></tr><tr><td>Starane 480 EC</td><td>Fluroxypir</td><td>U (unlikely)</td></tr><tr><td>Decis 25 EC</td><td>Deltametrin</td><td>II</td></tr><tr><td>Benlox 50 WP</td><td>Benomil</td><td>U (unlikely)</td></tr></table> <p>Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.</p>	Name	Active Ingredients	Class	Erkafuron 20 WG	Methyl Metsulfuron	U (unlikely)	Rollup 480 SL	Glyphosate	III	Garlon Mix 333	Triclopyr	II	Starane 480 EC	Fluroxypir	U (unlikely)	Decis 25 EC	Deltametrin	II	Benlox 50 WP	Benomil	U (unlikely)	Complied
Name	Active Ingredients	Class																						
Erkafuron 20 WG	Methyl Metsulfuron	U (unlikely)																						
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Decis 25 EC	Deltametrin	II																						
Benlox 50 WP	Benomil	U (unlikely)																						
	7.2.5b Why there is no other alternative which can be used.	Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.																						
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the																						

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		Stockholm or Rotterdam Conventions application from period 2022/2023.	
	7.2.5d Process to limit the negative impacts of the application.	Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.	
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>Based on the results of interviews with members of the spraying team for Bumi Sawit estate, it is known that the Company has provided a special mixing chamber for mixed pesticides before they applied to field. In addition, based on the review of documents and records of pesticide application, the company also provides clean water, soap and a first aid kit to support the sanitation and OHS aspects required by the spraying team.</p> <p>The company showed record of pesticide handling training on 7 November 2023 which attended by 34 sprayer workers.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	It is known that pesticide storage activities have been carried out in accordance with best practice, including the availability of MSDS according to the type of pesticide, the pesticide warehouse is equipped with adequate ventilation, the pesticide mixing place is equipped with bunds, the warehouse staff has PPE was given in the form of rubber gloves and masks, and warehouse staff also received special health checks.	Complied

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7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging. - Minor compliance -	Based on field observation, all used hazardous chemical container store in licensed temporary hazardous storage. There's no use of used chemical containers by workers for daily uses, such as water reservoir and house material. The inhabitants in emplacement of Division 2 also said that using a used pesticide container is not good for their health.	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	Based on field observation and documentation review, there's no areal spraying activities in company operational area.	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 -	Unit of certification shown records of medical check-up for pesticide operators conducted in 09 September 2023 and 23 March 2024. The results of medical check-up show that the health of all workers is still in normal condition. Based on interview with pesticide operator, they have been told about their medical check up result.	Complied
7.2.11	(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. - Critical (Major) compliance -	Unit of certification has established policy to prohibit pregnant and breastfeeding worker to work as a sprayer worker, fertilizer workers and other working related to agrochemical. This is according to a policy KHI-SMART/005-000 dated 1 August 2017 regarding female workers. The Policy has been disseminated to related workers on 19 April 2024, Based on interview with pesticide operators in BSWE confirmed that there is no pregnant worker who working as spraying.	Complied

Note For 7.2.11

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.

Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.

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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. Bumi Sawit Permai has a procedure for Hazardous Waste Management No. SOP/SMART/LEMS-EHSD/SADV/I/002 dated 2 July 2014.</p> <p>License of hazardous waste temporary storage (TPS LB3) from Head of Ogan Ilir Regent No.416/KEP/DLHP/2017 dated 16 June 2017 valid for 5 years and had storage time 180 days. Further, unit of certification hold technical detail for hazardous waste management (storage activity) from Environmental and Land Agency, Sumatera Selatan Regency on 28 June 2022 (valid as long as the company does not make changes and/or additions to other operational activities).</p> <p>Location:</p> <ul style="list-style-type: none"> • Bumi Sawit Estate, coordinate 3° 30' 40.95"S and 104° 20' 20.99"E • Bumi Sawit Mill, coordinate 3° 52' 57.00" S and 104° 34' 43.00" E <p>License covered some hazardous waste such as used oil, used filter, used battery, used rag, ex pesticide and chemical container, medical waste, and used lamp.</p> <p>Based on observations, it was observed that the hazardous waste TPS was in good condition and had been equipped with various K3 warnings and K3 facilities such as eyewash, emergency shower and fire extinguisher. The coordinate points are in accordance with the permits they have.</p> <p>The company also have an identification of potential impact in handling hazardous waste which stated in Environmental Aspect and Impact Identification and Evaluation Form (F/SMART/LEMS-EHSD/SADV/001/001), updated annually.</p>	Complied
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>Unit of certification has had an agreement with PT Primanru Jaya as official hazardous waste collector. The agreement under Work Agreement No. 092/EPMD/SPK-Pengelolaan LB3/BSP-PJ/X/2023 dated 9</p>	Complied

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	- Minor compliance -	<p>October 2023. Valid for 2 years until 8 October 2026. Hazardous waste managed i.e used oil, battery, rags, contaminated container, medical waste, fluorescent lamps, and used ink packaging.</p> <p>Primanru Jaya having a license related i.e:</p> <ul style="list-style-type: none"> • Recommendation license for hazardous waste transporter from Ministry of Environment and Forest No. S.1254/VPLB3/PPLB3/PLB.3/12/2018 dated 27 December 2018 (valid for 5 year). • Technical approval for hazardous waste management from Ministry of Environment and Forest No. S.698/PSLB/VPLB3/PLB.3/11/2021 dated 30 November 2021 (valid as long as company's operated). • License for transporting hazardous waste from Ministry of Transportation No. 8120009402150002 (valid until 25 February 2028). <p>During field visit, storage officer can demonstrate the hazardous waste handling. All the hazardous waste managed and placed properly.</p>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Identification of waste from Bumi Sawit Mill and Estates activities was available and recorded at SOP/SMART/LEMS-EHSD/SADV/I/002 – waste management procedure. The organic and anorganic waste was segregated at point of source meanwhile for hazardous waste will be kept in the hazardous waste temporary storage.</p> <p>Organic and inorganic wastes from Mill and Estates including housing were disposed to landfill in the Estate area. Areas of organic and inorganic wastes disposal was far from housing, in the flood-free area and not in swamp area and completed with warning sign not burning wastes. Based on observation there was open and close date at landfill.</p>	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			

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7.4.1	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<p>The certification unit has Fertilizer SOP (SOP / SMART / MCAR / IX / TA-PPK) to maintain soil fertility. The company has implemented practices to optimize production results in accordance with established procedures, including:</p> <ul style="list-style-type: none"> • SMARTRI routinely collects soil and leaf samples to ensure the elements needed by plants to produce optimally. The results of the soil and leaf analysis tested will be the basis for determining the dose of fertilizer in each Estate. • Fertilization activities that prioritize the principles of being on time, on target, at the right dosage and on application. In addition, marginal land (sandy) is given extra fertilization in the form of empty fruit bunches at a dose of 40 tons / ha. • The company's commitment to no longer use pesticides with the active ingredient paraquat or those belonging to WHO Classes 1A and 1B. • Application of palm oil effluent (POME) to increase soil fertility. • Maintenance of cover crops to reduce evaporation (maintain soil moisture). For example, planting beneficial plants (Antigonon leptosus). To all employees, spraying is always conveyed at morning apples not to spray the plants <p>Here are some of the recordings of upkeep activities:</p> <ul style="list-style-type: none"> - Weed Wiping realization (year to date 2024) as amount as 3,248 ha. - Herbicide Spraying realization (year to date 2024) as amount as 4,538.01 ha. - Circle weeding realization (year to date 2024) as amount as 896.87 ha. 	Complied
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		<ul style="list-style-type: none"> - Manual weeding realization (year to date 2024) as amount as 578.01 ha. 	
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> <p>- Minor compliance -</p>	<p>The company carries out soil analysis activities in the context of planning follow-up plant maintenance, including recommendations for fertilizer to be used for each land block. For example, the company carried out a leaf analysis examination for Bumi Sawit Estate (Ref.No.: 098/TANAH/AL/ANLZ/05/24, dated 21 May 2024):</p> <ul style="list-style-type: none"> - Sample Code 0-15 PR, BSWE5 H046: N 0.14%; P 64,7%; K 134%; Mg 30.5% - Sample Code 0-15 PR, BSWE5 J-41: N 0.26%; P 137%; K 81.8%; Mg 40.1%. <p>In addition, there are also leaf analysis records for each company unit, for example Records of soil testing at Bumi Sawit Estate carried out on April 2023 by SMART Research Institute Division in the many location. Here's the examples:</p> <ul style="list-style-type: none"> - Code Sample 1/BSWE1A-07/1: N 2.47%; P 0.177%; K 1.24%; Mg 0.42%. - Code Sample 2/BSWE1B-05/2: N 2.53%; P 0.175%; K 1.22%; Mg 0.42%. - Code Sample 3/BSWE1B-08/3: N 2.37%; P 0.165%; K 1.20%; Mg 0.42%. 	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 fertilizers.</p> <p>- Minor compliance -</p>	<p>The company carries out nutrient recycling strategy activities by implementing empty bunches in the field as a substitute for inorganic fertilizer. Here are some of the recordings:</p> <ul style="list-style-type: none"> - EFB application (year to date 2024) as amount as 17,970 kg. - LA Application (year to date 2024) as amount as 66,789 m3. 	Complied

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7.4.4	Records of fertilizer inputs are maintained. - Minor compliance -	The certificate holder showed manuring record for management unit: <ul style="list-style-type: none"> - MOP Realization (year to date 2024) as amount as 155,250 kg. - RP Realization (year to date 2024) as amount as 58,200 kg. - Kieserite Granule (year to date 2024) as amount as 65,800 kg - Urea Application (year to date 2024) as amount as 89,600 kg. 	Complied																												
Criteria 7.5: Practices minimise and control erosion and degradation of soils.																															
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available. - Critical (Major) compliance -	<p>The unit of certification provided Semi detail soil map Bumi Sawit Estate, PT Bumi Sawit Permai, scale 1:75,000, projection Mercator; Grid System Geographic; Datum WGS 84. Map source:</p> <ul style="list-style-type: none"> • GS Map No.3 OKI 1990 PT Bumi Sawit Permai • GS Map No.4 OKI 1990 PT Bumi Sawit Permai • GS Map No.7/BPN 2009 PT Bumi Sawit Permai • Semi Detail Soil Survey Bumi Sawit Estate 2015, PMNP Division. <p>Based on the map and soil characteristic, there were no fragile soils and peat at Bumi Sawit Estate area. Soil characteristic of Bumi Sawit Estate are as follow:</p> <table border="1"> <thead> <tr> <th>Soil type</th><th>Topography (%)</th><th>Areas (Ha)</th><th>%</th></tr> </thead> <tbody> <tr> <td><i>Typic Endoaquepts</i></td><td>0 – 3</td><td>700.37</td><td>7.90</td></tr> <tr> <td><i>Typic Endoaquepts</i></td><td>0 – 3</td><td>436.81</td><td>5.00</td></tr> <tr> <td><i>Typic Hapludults</i></td><td>3 – 9</td><td>1,238.31</td><td>14.00</td></tr> <tr> <td><i>Typic Hapludults Ink</i> <i>Typic Hapludults</i></td><td>3 – 9</td><td>2,405.01</td><td>27.30</td></tr> <tr> <td><i>Typic Hapludults</i></td><td>3 – 9</td><td>1,687.78</td><td>19.10</td></tr> <tr> <td><i>Typic Hapludults</i></td><td>9 – 16</td><td>2,041.29</td><td>23.10</td></tr> </tbody> </table>	Soil type	Topography (%)	Areas (Ha)	%	<i>Typic Endoaquepts</i>	0 – 3	700.37	7.90	<i>Typic Endoaquepts</i>	0 – 3	436.81	5.00	<i>Typic Hapludults</i>	3 – 9	1,238.31	14.00	<i>Typic Hapludults Ink</i> <i>Typic Hapludults</i>	3 – 9	2,405.01	27.30	<i>Typic Hapludults</i>	3 – 9	1,687.78	19.10	<i>Typic Hapludults</i>	9 – 16	2,041.29	23.10	Complied
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Water bodies		22.99	0.30												
TOTAL		8,823.90	100.00												
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	Based on semi detail soil map PT Bumi Sawit Permai (scale 1:75,000, projection Mercator; Grid System Geographic; Datum WGS 84) above, there is no steep terrain area in Bumi Sawit Estate.	Complied												
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	Based on field verification and interview with company representatives, there are no new oil palm planting in PT Bumi Sawit Permai.	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 unit of certification provided Semi detail soil map Bumi Sawit Estate, PT Bumi Sawit Permai, scale 1:75,000, projection Mercator; Grid System Geographic; Datum WGS 84. Map source:</p> <ul style="list-style-type: none"> - GS Map No.3 OKI 1990 PT Bumi Sawit Permai - GS Map No.4 OKI 1990 PT Bumi Sawit Permai - GS Map No.7/BPN 2009 PT Bumi Sawit Permai - Semi Detail Soil Survey Bumi Sawit Estate 2015, PMNP Division. <p>Based on the map and soil characteristic, there were no fragile soils and peat at Bumi Sawit Estate area. The map described types of soil, topography and hydrology.</p> <p>Based on field verification and interview with company representatives, there are no new oil palm planting in PT Bumi Sawit Permai.</p>	Complied												

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7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance -	Based on the soil map and soil characteristic, there were no fragile soils and peat at Bumi Sawit Estate area. The map described types of soil, topography and hydrology. Based on field verification and interview with company representatives, there are no new oil palm planting in PT Bumi Sawit Permai.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Based on the soil map and soil characteristic, there were no fragile soils and peat at Bumi Sawit Estate area. The map described types of soil, topography and hydrology. Based on field verification and interview with company representatives, there are no new oil palm planting in PT Bumi Sawit Permai.	Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -	Based on the soil map and soil characteristic, there were no fragile soils and peat at Bumi Sawit Estate area. The map described types of soil, topography and hydrology. Based on field verification and interview with company representatives, there are no new oil palm planting in PT Bumi Sawit Permai.	Complied
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	Based on the soil map and soil characteristic, there were no fragile soils and peat at Bumi Sawit Estate area. The map described types of soil, topography and hydrology. Based on field verification and interview with company representatives, there are no new oil palm planting in PT Bumi Sawit Permai.	Complied
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai.	Not Applicable



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		Not applicable.	
7.7.4	(C) Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance -	Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai. Not applicable.	Not Applicable
7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation. - Critical (Major) compliance -	Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai. Not applicable.	Not Applicable
PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.			
7.7.6	(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).	Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai.	Not Applicable

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	- Critical (Major) compliance -	Not applicable.	
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>Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai.</p> <p>Not applicable.</p>	Not Applicable

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

No	Category of River	Cross Section	Outside the Settlement		Inside at the Settlement		Articles
			Criteria	Minimum Riparian Zone	Criteria	Minimum Riparian Zone	
1	Levee		-	5 m	-	3 m	Article 6
2	Rivers with no dike (from river bank)		Big River River Basin > 500 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	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:	The company has carried out water management and maintenance of water sources in the plantation and factory areas. The water source used by the factory comes from the Rambang River, where the Rambang River has been included in environmental management and monitoring	Complied
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	<p>- Minor compliance -</p> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>(RKL/RPL). Then, the Rambang River also has tributaries, namely the Bunyan River and Suban River, as well as a catchment area in the form of swamps, all of which are included in the HCV study. Thus, the program and realization of the management of these water sources can be seen in the RKL/RPL report and the HCV Implementation and Management Report, which include, among others, the form of an official report and documentation of installing warning boards and planting of woody plants to prevent erosion on riverbanks, marking of boundaries, and testing and analysis of river water quality in the upstream and downstream parts.</p> <p>The surface water quality monitoring program refers to the RKL RPL matrix owned by the company, which is carried out every 6 months for the upstream and downstream of the Rambang River and Lubai River. Testing was carried out by the Mutuagung Lestari accredited laboratory. Based on the analysis report obtained information that water quality complied with all parameters.</p> <p>The quality standard for river water quality testing refers to PP No. 22 of 2021, Appendix VI (Class II). Based on the table above, it is known that the results of the analysis have met the quality standards.</p> <p>Water use for factory processes has been monitored and records are available in the Factory Water Usage Data form. The standard for water use is 1,244 m3/day (37,320 m3/month).</p> <p>Surface Water Collection and Utilization Permit (SIPPAIR) based on Business Permit to Support Business Activities Water Resources Concession Permit (River Area Authority of Provincial Government) PB-UMKU: 812031408129900030005, for PT. Bumi Sawit Permai, published on 28 April 2022.</p> <p>Letter of Investment Service and One-Stop Integrated Services South Sumatra Provincial Government – Letter of Fulfillment of Requirements No.157/DPMPTSP.V/IV/2022 dated 26 April 2022. Stating business</p>	
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		permits to support business activities (PB UMKU) Water Resources Exploitation Permit Public Works and Public Housing Sector for PT. Bumi Sawit Permai has fulfilled the administrative and technical requirements according to the Minutes of the South Sumatra Province Water Resources Management Office No.614/007/BAHP/DPSDA/2022 dated March 21, 2022; Technical Recommendation from the Office of Water Resources Management No. 610/904/DPSDA-BM/III/2022 dated 30 March 2022. Permits are valid for 2 years after PB UMKU has been verified.	
	7.8.1b Workers have adequate access to clean water.	Based on field observation in Estate and Mill, the company has provided clean water in housing complex from Mill's water treatment or well/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	(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). - Critical (Major) compliance -	The organization has established management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian. <ul style="list-style-type: none"> Riparian restoration with forest vegetation plant/tree. Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone. Conserve natural vegetation in riparian zone. 	Complied
7.8.3	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. - Minor compliance -	POME from Bumi Sawit Mill was processed through a series of wastewater treatment ponds: four anaerobic ponds. POME is monitored monthly as required by permit. Permit of wastewater for land application (LA) was available based on Head of Investment Board of Ogan Ilir Regency dated 20 May 2019. Valid for 5 years after issuance. The company has routinely conducted wastewater quality checks every month and the results of the quality analysis are in quarterly reports to the relevant agencies. The study was carried out on the results of	Complied

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		measurements in the second semester of 2023. The tests were carried out by the UPTD Environmental Laboratory of the Land and Environment Agency, Sumatera Selatan Province. The measurement results are in accordance with the quality standard stipulated by Minister of Environment Decree 29/2003. Standard parameters set include BOD 5,000 ppm and pH 6-9.	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>Surface Water Collection and Utilization Permit (SIPPAIR) based on Business Permit to Support Business Activities Water Resources Concession Permit (River Area Authority of Provincial Government) PB-UMKU: 812031408129900030005, for PT. Bumi Sawit Permai, published on 28 April 2022.</p> <p>Letter of Investment Service and One-Stop Integrated Services South Sumatra Provincial Government – Letter of Fulfillment of Requirements No.157/DPMPTSP.V/IV/2022 dated 26 April 2022. Stating business permits to support business activities (PB UMKU) Water Resources Exploitation Permit Public Works and Public Housing Sector for PT. Bumi Sawit Permai has fulfilled the administrative and technical requirements according to the Minutes of the South Sumatra Province Water Resources Management Office No.614/007/BAHP/DPSDA/2022 dated March 21, 2022; Technical Recommendation from the Office of Water Resources Management No. 610/904/DPSDA-BM/III/2022 dated 30 March 2022. Permits are valid for 2 years after PB UMKU has been verified.</p> <p>Water use for factory processes has been monitored and records are available in the Factory Water Usage Data form. The standard for water use is 1,244 m3/day (37,320 m3/month).</p> <p>Water usage record period January – December 2023</p>	Complied

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		Month	FFB Process (MT)	Water Process (m ³)	Ratio (m ³ /ton)	
		January	7,839	8,000.64	1.02	
		February	7,015	7,391.99	1.05	
		March	7,869	4,556.98	0.58	
		April	7,656	5,340.90	0.70	
		May	10,710	9,830.09	0.92	
		June	11,501	9,047.95	0.79	
		July	11,685	9,679.86	0.82	
		August	13,530	10,059.17	0.74	
		September	12,967	9,469.46	0.73	
		October	12,059	10,512.06	0.87	
		November	12,529	9,683.04	0.77	
		December	9,735	8,720.66	0.93	
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised						
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	<i>There are no changes in compliance statement compared to last year audit.</i> Bumi Sawit Mill and estates has been developing the programme/plan on how to conduct efficiency for utilization of fossil fuel by develop the standard to manage the consumption each of vehicles and electricity generator within litre per hours both for organization owned and contractors; the monitoring conducted by monthly and reported to technical department. It was also developed the plan/programme regarding optimization of renewable energy known as fibre and shell as				Complied

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		boiler fuels at mills, monitoring also conducted monthly by calculate the fibre and shell and utilize as boiler fuels whether during the construction or upgrading of all operations. There are monitoring records sighted regarding the utilization of fossils fuels and fibre shell.	
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <p>- Critical (Major) compliance -</p>	<p><i>There are no changes in compliance statement compared to last year audit.</i></p> <p>The source of greenhouse gas emission has identified on Environmental aspect and impact identification, updated on annual basis, as listed below:</p> <ul style="list-style-type: none"> • Methane from POME and composting at mill. • Fossil fuels emissions from vehicles and engines generator • Chemical fertilizer • Electricity usage • Chemical spraying <p>Several efforts to reduce GHG emissions is prepared as follows:</p> <ul style="list-style-type: none"> • Zero burning • Utilization of waste fibre and shell as boiler fuel and electricity from turbines • Reduce chemical fertilizer using EFB composting. <p>The records of each programme were sighted as evident implementation. The program was including objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 (six) months to ensure target was achieved.</p>	Complied

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		The Mill has calculated the net GHG emissions using The RSPO Palm GHG Calculator Version 4.0 and that data inputs are verified to be accurate. Capturing the information about summary of net GHG emissions, summary of field emissions and sinks, and summary of mill emissions and credits. Please refer to Appendix B for GHG Emission calculation.	
7.10.2	(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	There is no new planting within certified area of PT Bumi Sawit Permai – Bumi Sawit Estate after November 2005. Currently, the planting year of oil palm from 1995 - 2011. This indicator is not applicable.	Not Applicable
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored. - Critical (Major) compliance -	There is no new planting within certified area of PT Bumi Sawit Permai – Bumi Sawit Estate after November 2005. Currently, the planting year of oil palm from 1995 - 2011. This indicator is not applicable.	Not Applicable
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	The company shown SOP <i>Perencanaan Penanaman Areal Baru</i> (No. SOP/SMART/MCAR/I/TA-PPA), SOP Replanting (No. SOP/SMART/MCAR/II/TA-PRP), and SOP <i>Pembukaan Lahan Baru</i> (No. SOP/SMART/MCAR/IV/TA-PLB), issued on 12 June 2012. In these documents, it is explained that the company must avoid burning during the land clearing process and must adhere to the principles of soil and water conservation. There is no new planting within certified area of PT Bumi Sawit Permai – Bumi Sawit Estate after November 2005. Currently, the planting year	Complied

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		of oil palm from 1995 - 2011. Replanting was conducted by chipping and no use of fire.	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification. - Minor compliance -	The unit of certification has been shown SOP Fire Prevention and Control Measures for Land (No. SOP/SMART/HVMS-EVMD/USDV/VI/005). There is no new planting within certified area of PT Bumi Sawit Permai – Bumi Sawit Estate after November 2005. Currently, the planting year of oil palm from 1995 - 2011. Replanting was conducted by chipping and no use of fire.	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures. - Minor compliance -	There is no new planting within certified area of PT Bumi Sawit Permai – Bumi Sawit Estate after November 2005. Currently, the planting year of oil palm from 1995 - 2011. Replanting was conducted by chipping and no use of fire.	Complied

Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

PROCEDURAL NOTE for 7.12:

The 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.

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.

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.

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.

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>The company had done LUCA analysis based on document "Land Use Change Analysis Clarification Report PT Bumi Sawit Permai" by University Teknologi Malaysia on 27 April 2021. The results of LUC analysis methodology review is "PASS" with total area of final conservation liability is 47.02 ha. The LUC analysis methodology was verified by visually inspecting the classification results and checking whether any irregularities is present in the data.</p>	Complied
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>There's no change of information related to HCV assessment from previous audit.</p> <p>The company has carried out activities to identify protected areas and areas of high conservation value in the HCV/HCV Assessment Report of PT Bumi Sawit Permai, South Sumatra Province by the Biodiversity & Conservation Section (Sustainability Division) on 2013. With details of the existence of HCVs are HCV 1.1, HCV 1.2, HCV 4.1 and HCV 6 with total 335.43 ha. In Generally, HCV identification assessment cover many aspects which are: Ecology Landscape, Flora Aspect, Fauna Aspect and Economic, Social and culture aspect.</p>	Complied
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>Based on document review, field observation and stakeholder consultation, there is no new land clearing after 15 November 2018 on company operational area.</p>	
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>Based on document review, field observation and stakeholder consultation, there is no new land clearing after 15 November 2018 on company operational area.</p>	Complied

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	- Critical (Major) compliance -		
PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.			
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>The company has an SOP for maintaining protected areas and areas of high conservation value in the document:</p> <ul style="list-style-type: none"> - SOP Management and Monitoring HCV (SOP/SMART/BCOS-EHSD/SADV/I/002, 1 July 2014). - Work Instruction for HCV Signboard (IK/SMART/BCOS-EHSD/SADV/002/002, 1 July 2014) - Work Instruction for HCV Rehabilitation (IK/SMART/BCOS-EHSD/SADV/002/003, 1 July 2014) <p>This procedure ensures that there is no disturbance or damage to plants or wild animals in the conservation area and there is marking of conservation area boundaries and signboards regarding the protection of protected plants and animals.</p> <p>Based on field observation in Riparian of Bunian River (HCV 4), the r are sign board information related to the prohibition on hunting animals, the prohibition on poisoning and catching fish, and the prohibition on entering HCV areas.</p> <p>From interviews with harvest workers and maintenance workers at the Company, the workers are aware of the existence of HCV and the prohibition on hunting and preserving wild animals and fauna.</p>	Complied
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	Based on HCV assessment document review (as describe on indicators 7.12.2) and external stakeholder consultation (Plantation Agency and	Complied

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	<p>negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>Representative of Sukananti and Jiwabaru Village), there's no right of local communities has been identified on company operational area.</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The company has the latest HCV management plan in the 2023 HCV Work Program Document. In this program there are indicators that must be implemented, namely:</p> <ul style="list-style-type: none"> - Boundary Sign Monitoring (Quarterly) - Spraying boundaries sign construction (May 2023) - Socialization to all stakeholders (November 2023) - Sign Board Maintenances (Quarterly) - HCV Monitoring (Every Months) - RTE Species Monitoring (Quarterly) - HCV rehabilitation Monitoring (Quartely) <p>The program develops by Estate manager and approved by Regional Controller.</p> <p>For the implementation of the program, it informed in document "<i>Laporan Pelaksanaan Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi Tahun 2023</i>". The information of this document will be basis for next program (as a follow up). Here's the detail of activities which has been implemented:</p> <ul style="list-style-type: none"> - Construction of Spraying Boundaries Pole. - Controlling of HCV signs - Monitoring of Flora and Fauna 	Complied

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		<p>Based on the latest monitoring, there are RTE species, such as:</p> <p>Fauna Tupaia gracilis; Callosiurus notatus; Macaca fascicularis; Centropus sinensis; Lanius Schach; Ardea purpurea; Halcyon smyrnensis; Varanus salvator; Fejervarya limnocharis.</p> <p>Flora Quercus argentata; Leptospermum javanicum; Cratoxylum formosum.</p> <p>The organization has report this RTE monitoring to BKSDA Sumatera Selatan Province on 7 June 2024.</p>	
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>No new oil palm planting within scope of certification. During field visit, auditor did not find new planting. HCV management plan are still existed as describe on indicator 7.12.2 and applicable.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>No new oil palm planting within scope of certification. During onsite visit, auditor did not find new planting.</p> <p>Based on Areal Statement 2023, Bumi Sawit Estate as Unit of Certification had oil palm crops planted after November 2005. Those are:</p> <ul style="list-style-type: none"> - YoP 2008 = 108.61 Ha - YoP 2010 = 18.37 Ha - YoP 2011 = 46.56 Ha <p>Based form that data, the total of planting since 2005 173.54 Ha. According to this, Unit of Certification shall follow the Remediation and</p>	Complied

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		<p>Compensation Procedure (RaCP) and started with Land Use Change Analysis (LUCA). Golden Agri Resources (GAR) as parent company of PT Bumi Sawit Permai – Bumi Sawit POM already submit LUCA to the RSPO in May 2018 and has been responded by RSPO.</p> <p>Here's the Latest progression of RACP:</p> <ul style="list-style-type: none">- The approval from RSPO on October 2023 with detail information: "Remediation & Compensation Plan for GAR Batch 1 & 2 has achieved Satisfactory Results, and Thu, the RaCP process for the units involved in this project is now completed". RSPO also said that PT Bumi Sawit Permai (RaCP-1074) also involved in the project. The company needs to follow up this email by provide feedback on the project implementation in regard to contractual relations with the third party, to be able to assess the relevancy of such project structure.- The company showed record of implementation of compensation project in the name of "Project Progress Report RSPO Compensation Project Bunut Hulu Village Quarter 1 year 1" in 23 June 2024. The project aims to support the conservation and restoration of the Bunut Hulu Village Forest in Kalimantan Barat, Indonesia, covering 4,763 ha in Kapuas Hulu District. The main Objective of the project is the conservation and restoration of the BHVY ecosystem. The project led by local NGO Bentang Kalimantan through regular reporting and independent verification by the sustainable Commodities Conservation Mechanism (SCCM). Here's the detail of implementation record:<ol style="list-style-type: none">1. Development and enforcement of Village regulation to support sustainable forest and lake protection conservation.2. Conduct forest and lake ecosystem patrol and monitoring.	
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		<ol style="list-style-type: none">3. Train and provide capital support on livelihood from NFTP and fishery product.4. Contribution toward Bentang Kalimantan office operations: Supplies, Equipment and rent. <p>The 1-year implementation evaluation (refer to Annex 9) will be verified again in next surveillance.</p>	
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2023 for Bumi Sawit Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO ₂ e/tProduct
CPO	0.94
PKO	0.94

Extraction	%
OER	20.07
KER	6.00

Production	t/yr
FFB Processed	125,097.12
CPO Produced	25,108.7
PKO Produced	7,502.2

Land Use	Ha
OP Planted Area	7,501.32
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	21.00
Total	7,501.32

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	
Emission								
Land Conversion	7,520.22	0.08	2,424.55	0.28	0.00	0.00	9,944.77	
CO ₂ Emission from fertilizer	2,991.55	0.03	285.14	0.03	0.00	0.00	3,276.69	
NO ₂ Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Fuel Consumption	22.15	0.00	21.91	0.00	0.00	0.00	44.06	
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Sink								
Crop Sequestration	-8,775.23	-0.09	-2,298.16	-0.26	0.00	0.00	-11,073.39	
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Total	3,449.77	0.03	782.20	0.08	1,388.59	0.00	5,566.56	

*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	24,251.15	0.20
Fuel Consumption	239.84	0.00
Grid Electricity Utilization	209.43	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	24,970.20	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

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

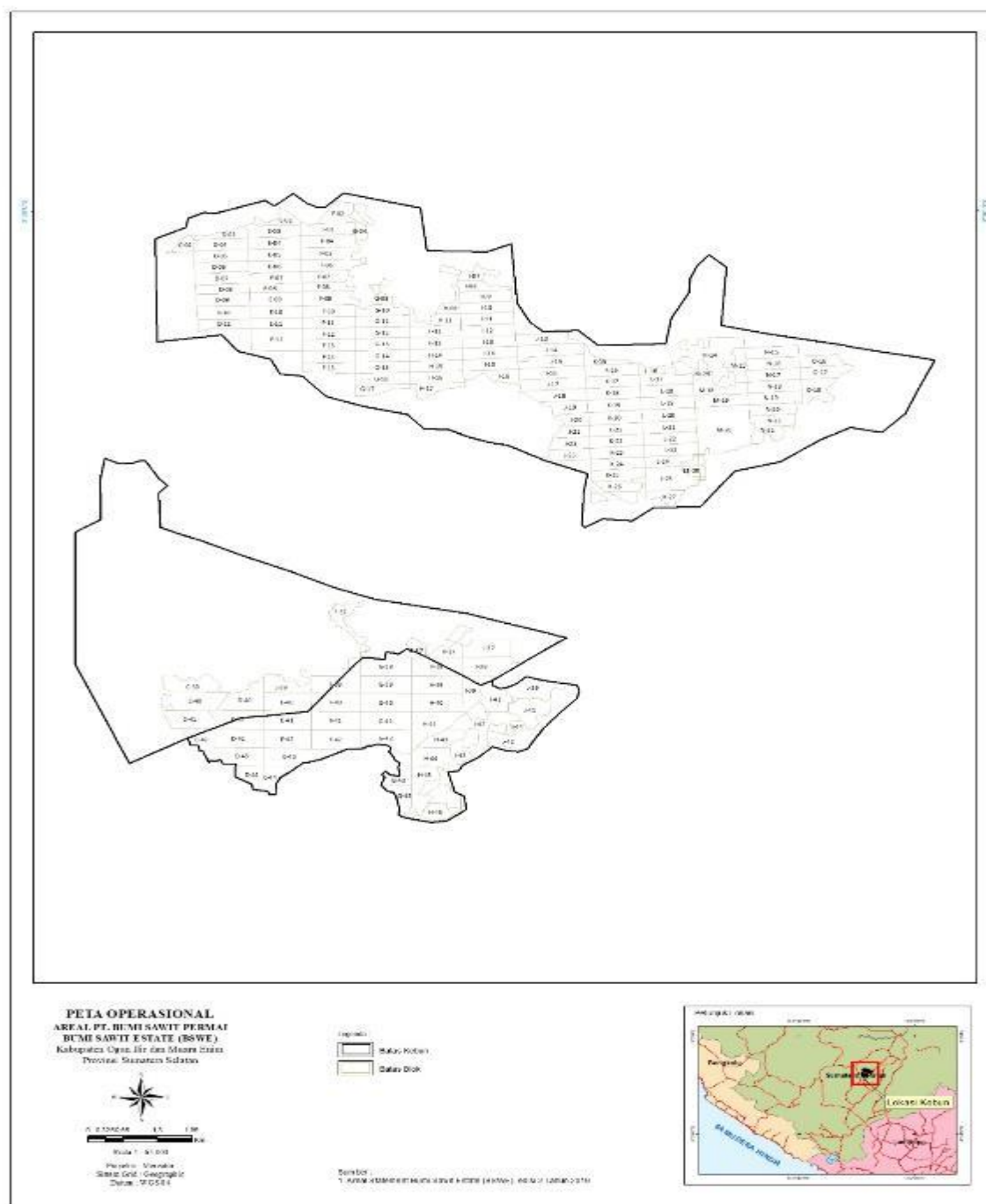
Appendix C: Location Map of Certification Unit and Supply bases



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Appendix D: Estate Field Map



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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