

**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. Inti Indosawit Subur
Client company Address: Head Office: JI MH Thamrin No 31 Jakarta 10230
Certification Unit: PT Saudara Sejati Luhur - Gunung Melayu I Mill Location of Certification Unit: Batu Anam Village, Sub-District of Rahuning, Asahan Regency, North Sumatra Province - 21274, Indonesia
Date of Final Report: 05/09/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	6 February 2006
Address	Jl MH Thamrin No 31 Jakarta 10230		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Saudara Sejati Luhur - Gunung Melayu I Mill		
Location / Address	Batu Anam Village, Sub-District of Rahuning, Asahan Regency, North Sumatra Province - 21274, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr Ivan Novrizaldie	E-mail	Ivan_novrizaldie@asianagri.com
Telephone	021 2301119	Facsimile	021 2301120

2. Certification Information			
Certificate Number	RSPO 620755	Certificate Start Date	21/03/2022
Date of First Certification	07/09/2015	Certificate Expiry Date	20/03/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	Determination of the conformity of the client's management system, or parts of it, with audit criteria and 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 checked="" type="checkbox"/> Indonesia National Interpretation 2020 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2015	SGS	10 June 2026
ISCC	EU-ISCC-Cert-DE100-03726123	SGS	01 Dec 2024
ISPO	BSI-ISPO 619194	BSI	18 July 2026

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Gunung Melayu I POM	Desa Batu Anam, Kecamatan Rahuning, Kabupaten Asahan, Provinsi Sumatera Utara - Indonesia	02° 47' 29.29" N	99° 35' 54.25" E
Pulau Maria Estate	Desa Batu Anam, Kecamatan Rahuning, Kabupaten Asahan, Provinsi Sumatera Utara - Indonesia	02° 45' 51.07" N	99° 34' 32.06" 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
Pulau Maria Estate	2,063	17.17	226.83	2,307	89.42
Total	2,063	17.17	226.83	2,307	89.42
Note: The Actual Area of Replanting to date Dec 2022 is 22 Ha, but the actual area until Dec 2023 in KPM is 243 Ha. However, the data used in the audit is to date 2022 because our areal statement data is presented annually and the audit was conducted in November 2023.					

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Pulau Maria Estate	22	0	2,041	0	2,041	22
Total (ha)	22	0	2,041	0	2,041	22
Note: The Actual Area of Replanting to date Dec 2022 is 22 Ha, but the actual area until Dec 2023 in KPM is 243 Ha. However, the data used in the audit is to date 2022 because our areal statement data is presented annually and the audit was conducted in November 2023.						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (March 2023 – Feb 2024)	Actual (December 2022 – October 2023)		Forecast (March 2024 – Feb 2025)
		Previous license period (Dec 2022 – Apr 2023)	Current license period (May – Oct 2023)	
Pulau Maria Estate	34,512	7,264.32	27,034.77	27,801
Total	34,512	34,299.09		27,801
Only 315.04 MT FFB entering and processed to Gunung Melayu 1 Mill, the remain FFB volume (26,959.77 MT) is process to Gunung Melayu II Mill – PT Gunung Melayu.				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (March 2023 – Feb 2024)	Actual (December 2022 – October 2023)		Forecast (March 2024 – Feb 2025)
		Previous license period (Dec 2022 – Apr 2023)	Current license period (May – Oct 2023)	
-		0	0	
Total				

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (March 2023 – Feb 2024)	Actual (December 2022 – October 2023)		Forecast (March 2024 – Feb 2025)
		Previous license period (Dec 2022 – Apr 2023)	Current license period (May – Oct 2023)	
CSV	240,000	2,983.18	20,039.03	30,000
Outside		40,064.78	79,825.69	250,000
Total	240,000	142,912.68		280,000
CSV stands for Corporate Shared Value which is part of the certification unit program to develop independent smallholders from surrounding plantation. FFB from CSV is normally entering directly to the mill				

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	December 2022	0	12,038.94	12,038.94
2	January 2023	240.03	11,320.83	11,560.86
3	February 2023	0	7,471.49	7,471.49
4	March 2023	0	7,393.13	7,393.13
5	April 2023	0	4,823.57	4,823.57
6	May 2023	0	15,668.38	15,668.38
7	June 2023	0	12,886.68	12,886.68
8	July 2023	75.01	21,358.26	21,433.27
9	August 2023	0	19,334.05	19,334.05
10	Sept 2023	0	15,540.03	15,540.03
11	Oct 2023	0	15,077.32	15,077.32
12		0	0	0
TOTAL		315.04	142,912.68	143,227.72

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (March 2023 – Feb 2024)	Actual (December 2022 – October 2023)		Forecast (March 2024 – Feb 2025)
	Previous license period (Dec 2022 – Apr 2023)	Current license period (May – Oct 2023)	
FFB	FFB		FFB
34,512 mt	240.03 mt	75.01 mt	27,801 mt
	TOTAL	315.04 mt	
CPO (OER: 23.20 %)	CPO (OER: 22.08 %)		CPO (OER: 23.20 %)
8,007 mt	52.88 mt	16.67 mt	6,450 mt
	TOTAL	69.55 mt	
PK (KER: 5.00 %)	PK (KER: 5.17%)		PK (KER: 4.70 %)
1,726 mt	12.49 mt	3.81 mt	1,307 mt
	TOTAL	16.30 mt	
Note: Only 315.04 MT FFB entering and processed to Gunung Melayu 1 Mill, the remain FFB volume (26,959.77 MT) is process to Gunung Melayu II Mill – PT Gunung Melayu.			

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	December 2022	0	0
2	January 2023	52.88	12.49
3	February 2023	0	0
4	March 2023	0	0
5	April 2023	0	0
6	May 2023	0	0
7	June 2023	0	0
8	July 2023	16.67	3.81
9	August 2023	0	0
10	September 2023	0	0
11	October 2023	0	0
TOTAL		69.55	16.3

11. Summary of Actual Volume sold					
Current License period (May – Oct 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0	16.67	0	0	16.67
PK (MT)	0	0	0	0	0
Credits	0	0	0	0	0
Previous License period (Dec 2022 – Apr 2023)					
CPO (MT)	0	52.70	0	0	52.70
PK (MT)		0	0	0	
Credits	0	0	0	0	0
Note: Only 315.04 MT FFB entering and processed to Gunung Melayu 1 Mill, the remain FFB volume (26,959.77 MT) is process to Gunung Melayu II Mill – PT Gunung Melayu.					

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				
			-	
TOTAL				

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11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. SDS	ISCC	69.37	-
TOTAL			69.37	-

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

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
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)
TOTAL						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits							
Physical							
Previous License period (key in 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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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)

Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **27-30 November 2023**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on 21-22 February 2024. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)
Gunung Melayu I POM	X	X	X	X	X
Pulau Maria Estate	X	X	X	X	X

Tentative Date of Next Visit: November 27, 2023 - November 30, 2023

Total Number of Mandays: 9 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Yudwi Wisnu Rahmanto (YWR)	Team Leader	<p>Education: Holds a Bachelor of Forestry with Silviculture major study, Faculty of Forestry, University of Gadjah Mada</p> <p>Work Experience: 7 months working experience in palm oil industry as Agronomy Field Assistant. 11 years working experience as sustainability auditor covering Sustainable Forest Management by FSC FM/COC Scheme, RSPO, ISPO, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Training, SMETA Requirements Training, ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme, High Conservation Value (HCV) Training, Sustainability Reporting Assurance Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO ISH Standard Training Course and Endorsed RSPO Supply Chain Lead Auditor Training Course.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p>

		<input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Edy Widodo (EWD)	Team Member	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p> <input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system) </p>
Briyogi Shadiwa (BS)	Team Member	<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 Lead Auditor 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, SA 8000 Requirement Training, ISO 45001:2018 Awareness, OHS Expert Training (Ahli K3 Umum), 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 checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system) </p>
Mujinius Jalaraya (MJ)	Team Member	<p>Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at</p>

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		<p>Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training</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 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>
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Accompanying Persons:

Name	Role
Sansan Suhendar (SS)	Observer

2.3 Assessment Plan

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

Date	Time	Subjects	YWR	EWD	BS	MJ
Monday, 27/11/2023	07.05-09.30	Flight Jakarta – Kualanamu (Garuda GA182)	✓	✓	✓	
	09.30 – 14.00	Travel from Kualanamu to PT Saudara Sejati Luhur – Gunung Melayu 1 POM	✓	✓	✓	
	14.30 – 15.30	Opening Meeting	✓	✓	✓	
	15.30 – 17.00	Document review	✓	✓	✓	

Date	Time	Subjects	YWR	EWD	BS	MJ
Tuesday, 28/11/2023	08.00 – 12.00	<ul style="list-style-type: none"> • Field visit to Pulau Maria Estate - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, oil palm nursery, replanting, area with slope. - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities - Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. - Visit to HGU boundary poles, border with surrounding entities - Visit to HCV area, riparian zone. • Stakeholder consultation 	√	√	√	
	12.00 – 14.00	Lunch break	√	√	√	
	14.00 – 16.30	Document review Pulau Maria Estate	√	√	√	
	16.30 – 17.00	Audit progress brief	√	√	√	
Wednesday 29/11/2023	08.00 – 12.00	Document review Gunung Melayu 1 POM	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√

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Date	Time	Subjects	YWR	EWD	BS	MJ
	14.00 – 16.30	Field visit to Gunung Melayu 1 POM: Best Management Practice for Mill Processing and RSPO Supply Chain Certification Standard; Site visit to check on FFB receiving, FFB process, CPO and PK dispatch, document, and record keeping; Implementation of OHS (loading ramp, processing stations, workshop, boiler, turbine, diesel bowser, material warehouse, fire-fighting equipment); Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, hazardous waste storage, Biogas Plant (if any)); Interview with workers related to human resource management, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Interview with workers related to health and safety condition, training provision, worker right and condition, etc. Supply Chain for Palm Oil Mill	✓	✓	✓	✓
	16.30 – 17.00	Audit progress brief	✓	✓	✓	✓
Thursday 30/11/2023	08.00 – 10.00	Report preparation	✓	✓	✓	
	10.00 – 11.30	Closing meeting	✓	✓	✓	
	11.30 – 15.30	Traveling to Kualanamu airport	✓	✓	✓	
	16.50 -	Kualanamu – Jakarta (Garuda GA121)	✓	✓	✓	

NCR Close Out

Date	Time	Subjects	MJ
Wednesday, 21/02/2024	08.00 – 08.30	Opening Meeting - Presentation by PT Saudara Sejati Luhur – Gunung Melayu I POM & Supply bases - Presentation by BSI Indonesia	✓
	08.30 – 12.00	Verification of CAP and its implementation PT Saudara Sejati Luhur – Gunung Melayu I POM NCR #2426063-202311-M1, indicator 3.4.3	✓

		NCR #2426063-202311-M2, indicator 3.6.2 NCR #2426063-202311-M3, indicator 6.2.3 NCR #2426063-202311-M4, indicator 6.7.3 NCR #2426063-202311-N1, indicator 2.1.3 Field Visit to Gunung Melayu I POM & Pulau Maria Estate Interview with workers and related PIC	
	12.00 – 14.00	Break	√
	14.00 – 15.30	Continue for NCR Close Out verification	√
	15.30 – 16.00	Report Preparation	√
	16.00 – 17.00	Closing Meeting	√

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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?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>There are remaining mill and estate that has not certified yet:</p> <ul style="list-style-type: none"> - Bahilang Estate (1,019 ha) as Supply base for Tanah Datar Mill, planned in year 2024 due to still in process of RACP Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024; - Topaz Estate (230 ha) as supply bases of Topaz Mill planed in 2026 due to HGU still in the process, to propose to Local Government and BPN Pusat; - Teluk Panjie Estate (801 ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat); - Sentral Estate (2,996 ha) as Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP (recertification 2020). Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. • Revision of Time bound plan has been approved by RSPO on 19 April 2023. The submission is according to the template as announced by the RSPO Secretariat on 21/12/2021. 	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.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 19 April 2023. Justification available and approved by RSPO on 19 April 2023.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is time bound plan revision dated 19 April 2023. Justification available and approved by RSPO on 19 April 2023. Justification as below:	Complied

	<ul style="list-style-type: none"> - Bahilang Estate (1,019 ha) as Supply base for Tanah Datar Mill, planned in year 2024 due to still in process of RACP Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024; - Topaz Estate (230 ha) as supply bases of Topaz Mill planed in 2026 due to HGU still in the process, to propose to Local Government and BPN Pusat; - Teluk Panjie Estate (801 ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat); - Sentral Estate (2,996 ha) as Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP (recertification 2020). Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. <p>This has been consistent with ACOP reporting.</p>	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses in implementation of the plan.	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 any fundamental failure to justify delay in planning the assessments.	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.	According to internal audit result and HCV assessment for uncertified unit it was confirmed that there is no primary forest or HCV areas replace for plantation. All uncertified unit was existing plantation since 1990 and some of the plantation has been replanting.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new planting after January 2010. RaCP for Bahilang and Sentral Estate still on-going process, Concept Note still on Progress and submit to RaCP team at Q2 2023.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>According to internal audit result on 14 – 19 August 2023 in Bahilang Estate, 22 – 27 May 2023 in Teluk Panji Estate, 10 – 16 May 2023 in Topaz Estate and 8 – 16 August 2023 in Sentral Estate, there is no land conflict occur in area of uncertified units: Topaz Estate, Bahilang Estate, Teluk Panjie Estate and Sentral Estate.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-</p>	Complied

	compensation/racp-tracker updated on 25 March 2024, PT Inti Indosawit Subur has: <ul style="list-style-type: none"> • MU's with potential liabilities: 4 units • LUCA Submitted (MUs): 4 units • LUCA review completed (MUs): 4 units • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 2 units • Concept Note approved (MUs): 2 units • Concept Note submitted (MUs): 0 • Concept Note endorsed (MUs): 0 • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 1 Remediation Plan approved (MUs): 0	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023; According to internal audit result confirmed that there is no Labor disputes occur in this management unit.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023; According to internal audit result confirmed that there is no Labor disputes occur in this management unit.	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.	Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023. Report of internal audit are available. Result of internal audit: <ul style="list-style-type: none"> - Bahilang Estate, Teluk Panji Estate and Sentral Estate has complies to relevant regulation, no issue regarding the legal compliance. - No complaint or grievances and disputes from stakeholders and affected parties. - No labor disputes occur since the latest audit. - No land conflict; Documents related to the history of land tenure and the actual legal or customary use of the land are available. No new plantings are established on local peoples land and no HCV area replacement.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	According to internal audit result, there is no 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.	Complied

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Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders consultation already conducted during internal audit for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023. There is no issue from stakeholder consultation.	Complied
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3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	No smallholders within scope of Gunung Melayu I POM.	Not Applicable

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Approved Time Bound Plan

Name of Mill	Mill Address	Name of Supply Bases	Estate Address	Time Bound for Certification	Status
Buatan I Mill – PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill - PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015 *Split From Buatan Estate Since 1 January 2019
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Ukui I Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	*Split From Ukui & Soga Estate Since 1 January 2019
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016

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Ukui II Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification on August 2017
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification on August 2017
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification on August 2017
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate 1	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015
		Topaz Estate 2	Petapahan Village, Tapung District, Kampar Regency, Riau	2026	Planned to be certified in 2026

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Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2015	Certified on 20 February 2015
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on November 2022
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2022	Certified on November 2022
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on November 2022
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2024	*Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	2015	Certified on 6 March 2015

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Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	2015	Certified on 21 April 2015
		Teluk Panjie Estate (801 Ha)		2026	HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat)
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2015	Certified on 7 January 2015
		Peranap (Plasma)		2016	Certified on 18 August 2016
Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015
		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
		Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015

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Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 8 July 2015
		Sentral Estate		2024	Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2016	<ul style="list-style-type: none"> • Certified on 23 December 2016 as Independent Mill • Audit in 2016 as Mill and Supply Base
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	Certified on 2018
		Aek Kuo (501 Ha)		2018	
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul style="list-style-type: none"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill

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 Four (4) Critical; *One* (1) Minor raised. The **PT Saudara Sejati Luhur – Gunung Melayu I POM** Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2426063-202311-M1	Issued Date	29/11/2023
Due Date	28/02/2024	Closure Date	21/02/2024
Indicator & Category (Critical / Minor)	3.4.3 Critical		
Statement of Nonconformity:	Unit of certification cannot provide the report of Social Impact management program and its monitoring plan.		
Requirement Reference:	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.		
Objective Evidence:	PT Saudara Sejati Luhur has had SIA document "Laporan Efektivitas Upaya Pengelolaan Sosial PT. Sejati Saudara Luhur – PKS Gunung Melayu I, Kabupaten Asahan, Provinsi Sumatera Utara" year 2017 which includes a social impact management program, but the unit of certification cannot provide the report of Social Impact management program and its monitoring plan during audit.		
Corrections:	<ul style="list-style-type: none"> Collect data on management of social aspects and complete the report regarding the scope of social impacts by ongoing operational activities and operational activities that will be developed in the RKL-RPL report. Conduct surveys of the surrounding community regarding social issues and community perceptions of the company's existence and its impact on society Complete the SIA study and the latest SIA review for 2023 which is pending 		
Root Cause Analysis:	<ul style="list-style-type: none"> There is a lack of supporting data in the social aspects arising from operational activities of company so that detailed of the management and monitoring of the company's social aspects are not included in the discussion in the RKL/RPL report. On the other hand, the Company is also in the process of completing the latest SIA review and review of social impact studies to prepare social impact management and monitoring plans. 		
Corrective Actions:	<ul style="list-style-type: none"> Issued Work Instructions (WI) as a reference in preparation RKL-RPL report document in which the WI states how to collect social aspect data and reporting. Coordination with environment division to review the RKL-RPL report before submission to related government agency each semester. 		

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Assessment Conclusion:	<p>CLOSED</p> <p>The Company has collected data related to the management and monitoring of social impacts and reported on the management and monitoring of social impacts carried out by the Company including:</p> <ul style="list-style-type: none"> ✓ Management and monitoring of social impacts on increasing community income ✓ Management and monitoring of social impacts on public health. ✓ Social conditions Increase in community income & attitudes and perceptions of the community <p>Revision of RKL-RPL report period semester I and II year 2023 was sighted and in accordance with matriks of management and monitoring of social and environmental assessment (RKL-RPL matriks). PT SSL has conducted a survey of local community perceptions of the company's existence and its impact on them. Survey conducted by public relation division on 6 december 2023 to responden of Batu anam village. Evidence of survey by quisioner can be demonstrated during NCR Close out. PT SSL has complete the SIA study and the latest SIA review for 2023 cooperate with independent consultant Lingkar Komunitas Sawit (LINKS). Final report of SIA study and review are available in "Laporan Social Impact Assessment PT Saudara Sejati Luhur 2023". SIA study report will be the reference of management and monitoring of social impact beside RKL-RPL matrix. PT SSL has issued the WI No. 021/EST-GM/MEMO/I/24 dated 8 January 2024 concerning RKL-RPL reporting procedure.including procedures for collecting data on social aspects. Sustainability division and environmental division has made coordination to review the revision of RKL-RPL report which is include the management and monitoring of social aspect. Report revision of RKL-RPL semester I and II year 2023 has been review and submit to environmental agency of Asahan regency. Receipt of RKL-RPL report can be shown during audit.</p>
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Non-conformity			
NCR Ref #	2426063-202311-M2	Issued Date	29/11/2023
Due Date	28/02/2024	Closure Date	21/02/2024
Indicator & Category (Critical / Minor)	3.6.2 Critical		
Statement of Nonconformity:	Fire emergency response facilities are not properly monitored at Gunung Melayu-1 Mill		
Requirement Reference:	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	Based on the results of field observations at Gunung Melayu I POM, it is known: - Hydrant hoses and nozzles are not available in Box No.2 (Sterilizer Station) - The hydrant hose is damaged in Box No. 4 (Kernel Station)		
Corrections:	<ul style="list-style-type: none"> • Replace damaged or unsuitable nozzles and hoses with new nozzles, and standby the water pump machine at the center of the mill so that it is easy to reach and increase water pressure to reach the highest point in the factory area. 		

	<ul style="list-style-type: none"> Carrying out Simulations and Drills involving the highest leadership as Team Commander who coordinates the simulations and drills and employees who are part of the emergency response team. Carrying out socialization in the form of installing billboards and conveying during the master morning about the dangers of fire and actively checking all hydrant points and nozzle equipment for fire facilities.
Root Cause Analysis:	Emergency response equipment such as hydrant hoses are used for other purposes such as watering and cleaning factory areas and are not stored in their proper place. lack of employee awareness and understanding regarding the placement of emergency response equipment due to lack of socialization from the company. Lack of monitoring from the company regarding hydrant emergency response equipment in the Gunung Melayu I palm oil mill.
Corrective Actions:	<ul style="list-style-type: none"> Create checklists and regular programs to socialize employees and actively check hydrants once a month for all hydrant points including hydrant nozzle and hose equipment. Create billboards regarding the prohibition of the use of emergency response tools for other operational activities other than emergency response and simulation Issued memorandum regarding OHS discipline at work and provide sanctions for employees who violate disciplinary rules related to OHS. The Sustainability Officer inspects the conditions of the mill working environment once a month including hydrant and its equipment.
Assessment Conclusion:	<p>CLOSED</p> <ul style="list-style-type: none"> Gunung Melayu I Mill has replace the damaged or unsuitable nozzles and hoses with new one. It was sighted during field visit on 21 Feb 2024. Company also has provide the water pump machine and standby at the Gunung Melayu I mill. During field visit to Gunung melayu I mill, Hydrant simulations are carried out to ensure the condition of the hydrant and its equipment is functioning properly. It was noted that hydrant equipment are properly function and the water pressure are adequate. PT SSL – Gunung melayu I has been carried out Simulations and Drills on 11 December 2023 involving the mill employees who are part of the emergency response team. Record and minutes of simulation and drill are available during audit PT SSL Gunung Melayu I Mill has been installing billboards regarding the fire awareness and the placement of emergency response equipment. Billboard are placement in the strategic place near to hydrant point. During field visit billboard are available and well installed. PT SSL Gunung Melayu I Mill has conducted the regular master morning to talk about the dangers of fire and actively checking all hydrate points and nozzle equipment for fire facilities. During interview with mill operator it was confirmed that they have aware the danger of fire and maintain the hydrant equipment to be in place. Company has developed the checklists of mill inspection including hydrant equipment. Mill inspection are recorded in "Form Inspeksi General Mill Inspection". Latest inspection conducted on 15/12/2023 and 11/01/2024 by sustainability officer. Company also has Issued the memorandum regarding OHS discipline at work and provide sanctions for employees who violate disciplinary rules related to OHS.

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	Memorandum No. ES-PGS/EXT/4/23 dated 4 Dec 2023. Socialization of memorandum has been conducted during regular master morning.
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Non-conformity			
NCR Ref #	2426063-202311-M3	Issued Date	29/11/2023
Due Date	28/02/2024	Closure Date	21/02/2024
Indicator & Category (Critical / Minor)	6.2.3 Critical		
Statement of Nonconformity:	Unit of certification did not comply with other legal labour requirements in contracted workers agreement (PHL/PKWT) as required by Government Regulation No. 35 of 2021 [Articles 15 and 16] effective from date 2 February 2021, related to compensation terms.		
Requirement Reference:	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.		
Objective Evidence:	<p>- Based on interviews with several workers and labor unions, they do not understand the PHL/PKWT compensation in accordance with PP no. 35/2021</p> <p>- Based on interviews with fertilizer workers at Afdl. 1 Pulau Maria Estate ((Sumarni, Bien Fitriani, Atika Anggraini dan Maya Dawantri) with PHL status who have worked >4 years, they stated that they did not understand the PKWT compensation and from 2021 they had never received PKWT compensation.</p> <p>- Perjanjian Kerja Untuk Jangka Waktu Tertentu document does not explain the provision of PHL/PKWT compensation at the end of the employment agreement period. In Article IV; Compensation only explains the worker's wages/salary and income tax, for example:</p> <p>1) Perjanjian Kerja Harian No. 106/PKH/KPM/11/2023 dated 6 November 2023 in the name of Akhirudin Harahapboleah (Harvester) at Pulau Maria Estate.</p> <p>2) Perjanjian Kerja Waktu Tertentu No. 003/PKWT/KPM/II/2023 dated 1 February 2023 on behalf of Sudarto on position Harvester at Pulau Maria Estate</p> <p>3) Perjanjian Kerja Harian Lepas No. 005/PKHL/PGS/X/2023 dated 1 October 2022 on behalf of Jefry Lubis on position Autofeder operator helper, validity period is 3 months</p>		
Corrections:	Coordinate with HRD (Medan Head Office) to correct and complete the redaction documents in the contract worker agreement (PHL/PKWT) as required by Government Regulation no. 35 of 2021 [Articles 15 and 16] which applies, relates to compensation provisions. With the follow-up review of the work agreement, it is hoped that this will become a form of socialization of Legal Compliance related to describing regulatory changes relevant to conditions in detail.		
Root Cause Analysis:	The PIC's (HR) lack of proactiveness in implementing its duties as an evaluator in the current updated regulatory changes has resulted in a lack of understanding in the management unit to fulfil the relevant regulation PP 35 of 2021, as a detailed description of the basic requirements of labor law.		
Corrective Actions:	<ul style="list-style-type: none"> Develop a mechanism for implementing PP 35 of 2021 guided by updated procedures in the employment aspect. Develop the contract template in accordance with PP 35 and amend all the workers contract according to the new template contract. 		

	<ul style="list-style-type: none"> • Reaffirmation to the management unit and PIC in the form of a Memorandum from the highest leadership (Group Manager) regarding the implementation and evaluation of compliance with relevant regulatory requirements (PP35) with mechanisms in the management unit. • The internal audit team comprehensively evaluates the implementation of PP35/2021 on internal audit activities which are carried out at least once a year.
Assessment Conclusion:	<p>CLOSED</p> <ul style="list-style-type: none"> • PT SSL has made coordination with HRD (Medan Head Office) to correct and complete the redaction documents in the contract worker agreement (PHL/PKWT) as required by Government Regulation no. 35 of 2021 [Articles 15 and 16] which applies, relates to compensation provisions. Template of workers contract can be shown during audit as present in "Perjanjian Kerja Waktu tertentu". The workers contract template has been review and approved by Dinas Tenaga Kerja Kabupaten Asahan dated 6 February 2024 to be implemented. In article 4 compensation it was stated that company will paid the compensation in accordance with labor regulation: The company will pay compensation in accordance with applicable regulations if (a) work agreement ends, (b) The company extended the employment relationship. • Company also has made the mechanism of compensation calculation and payment according to PP35/2021. The mechanism also has been review and approved by Dinas Tenaga Kerja Kabupaten Asahan dated 6 February 2024. • During interview with Dinas tenaga Kerja Kabupaten Asahan on 21 February 2024 it was confirmed that they have aware the letter from PT SSL regarding the request to review the draft contract of PKWT and the mechanism of compensation payment according to PP 35/2021; letter No. 003/HR-RO1/EXT/1/2024 dated 2 February 2024. <p>Dinas Tenaga Kerja Kabupaten Asahan (head of the industrial relations disputes section) confirmed that:</p> <ul style="list-style-type: none"> - The implementation of PP35/2021 can only be implemented in 2023 after a material review of the UU Cipta Kerja which was carried out for 2 years from 2021 to 2023. - With the publication of PP35/2021, adjustments need to be made, it will takes time for companies to implement them. In 2023 the government issued Law No. 6 year 2023 concerning the enactment of the UUU Cipta Kerja into law including its derivative regulations (PP 35/2021). - PKWT contract template has been discuss and socialize to the labor union. <p>Interview with head of union labor PT SSL also confirmed that he has acknowledge the draft of contract PKWT and compensation mechanism and the labor union will supervise and monitor the implementation of the PKWT contract and the implementation of the compensation mechanism in accordance with PP35/2021.</p> <ul style="list-style-type: none"> • Sampled of PKWT contract was verified during NCR Close out and interview with workers confirmed that they have aware regarding the new contract template and the compensation mechanism according to PP35/2021. • Sustainability PT SSL has coordination with Internal audit department to review and check the implementation of PP35/2021 during next internal audit. Email correspondence of the discussion can be shown during audit

Non-conformity			
NCR Ref #	2426063-202311-M4	Issued Date	29/11/2023
Due Date	28/02/2024	Closure Date	21/02/2024
Indicator & Category (Critical / Minor)	6.7.3 Critical		
Statement of Nonconformity:	Unit of certification did not provide PPE (rubber boots) for the contracted worker (PKWT) freely.		
Requirement Reference:	(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	Based on field observations and interviews with PKWT workers at Pulau Maria Estate, it is found that: - 2 workers of EFB spreader using self-purchased PPE boots. - 2 workers of Land Application using PPE boots purchased by themselves.		
Corrections:	<ul style="list-style-type: none"> • Providing PPE shoes for empty bunch and land application workers Company carries out routine checks on the use of PPE and its condition monthly. • Issued a memorandum to the KTU, assistant and warehouse head to confirm the mechanism for replacing PPE and that there would be no fees for employees who took PPE at the company warehouse 		
Root Cause Analysis:	Lack of understanding and negligence from assistants and KTU regarding the implementation of the PPE procurement SOP where they are required to provide PPE stock of 10% from total needed to replace workers PPE if necessary (damaged PPE) or needs replacement.		
Corrective Actions:	<ul style="list-style-type: none"> • Company Management and OHS experts conducted socialization to Staff and KTU regarding the SOP for Procurement of PPE to provide PPE as much as 10% of the total requirement Issued a memorandum to the KTU, assistant and warehouse head to confirm the mechanism for replacing PPE and that there would be no fees for employees who took PPE at the company warehouse. • Company carries out routine checks/monitoring on the use of PPE by workers and its condition monthly. • Sustainability officers and warehouse heads carry out warehouse checks once a month regarding the condition of PPE stock and ensure that PPE stock is at least 10% of the total PPE requirement 		
Assessment Conclusion:	<p>CLOSED</p> <ul style="list-style-type: none"> • PT SSL has immediately provide the PPE shoes for workers of empty bunch and land application and daily workers who have not received PPE or whose PPE has been damaged. Evidence of PPE provision and handover can be shown during audit. • PT SSL also has carried out regular checks/monitoring on the use of PPE by workers and its condition monthly. Record of monitoring was sighted in General Estate Inspection From AA-SOP-HSE-10A. Sample seen on record of inspection dated 12/12/2023 and 26/01/2024 Pulau Maria Estate. PPE checklist also 		

	<p>available in "Observasi Alat Pelindung Diri" sample seen on PPE checklist dated 8/1/2024.</p> <ul style="list-style-type: none"> • Management of PT SSL has issued the Memorandum No. ESTM/MEMO/1/23 dated 1 Dec 2023 regarding the PPE usage and PPE replacement for workers which mentioned that field supervisor required to check the workers PPE usage and ensure that all workers use appropriate PPE; KTU and warehouse head required to informed the PPE replacement mechanism for all workers and there are no fees for taking PPE by employees. • During visit to warehouse of Pulau maria Estate it was found that there are PPE stock in warehouse for workers minimum 10%, it was confirmed by PPE stock card in warehouse. Warehouse head and KTU of Pulau Maria Estate are aware about the PPE provision for all workers are freely and workers can be change their PPE freely if any damaged or broken in PPE caused by working activity. • Sustainability officers and warehouse heads PT SSL has been carry out the warehouse checks for PPE stock to ensure the PPE stock minimum 10%, if the stock less than 10% KTU will request for purchase order the PPE.
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Non-conformity			
NCR Ref #	2426063-202311-N1	Issued Date	29/11/2023
Due Date	28/11/2024	Closure Date	Open
Indicator & Category (Critical / Minor)	2.1.3 minor		
Statement of Nonconformity:	The certification unit does not manage operational legal boundaries properly.		
Requirement Reference:	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.		
Objective Evidence:	The boundary peg No. SSL-064 has been registered in the HGU monitoring of PT Saudara Sejati Luhur and is equipped with coordinates. However, during field observations to ensure the maintenance of boundaries on Pulau Maria Estate, the HGU peg No. SSL-064 could not be found.		
Corrections:	Find/install/replace lost HGU poles in the field with new HGU stakes		
Root Cause Analysis:	Lack of monitoring and maintenance of HGU stakes in the field according to the HGU stake map		
Corrective Actions:	Monitoring and maintenance of HGU stakes regularly once a month and ensuring that the HGU stake number matches the HGU map and the position of the HGU stake matches the coordinates of the HGU stake on the HGU map.		
Assessment Conclusion:	Open. To be verified in the next surveillance assessment		

Opportunity for Improvements	
OFI #	Description
OFI 1	-

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 #	2292547-202212-M1	Issued Date	23/12/2022
Due Date	22/03/2023	Closure Date	20/03/2023
Indicator & Category (Critical / Minor)	7.3.2 Minor escalated to Major		
Statement of Nonconformity:	Lack of evidence that disposal of waste material is demonstrated properly		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Based on a field visit at Pondok Coklat Housing, Pulau Maria Estate, it was found that domestic waste was not disposed of at the landfill that had been provided, but disposed of not properly behind the Pondok Coklat housing.		
Corrections:	Conduct special inspection and cleaning of the houses that do not throw domestic waste in the available bin every 2 months.		
Root Cause Analysis:	There is no sudden inspections and visits by management (all staff and security) in the last 2 years due to the COVID 19 pandemic, thereby reducing the awareness of residents of housing, causing indiscipline in waste management.		
Corrective Actions:	Making sign board regarding the disposal of domestic waste and including hazardous waste which is often used; Make a plan for a routine schedule of employee housing inspections signed by all staff and managers.		
Assessment Conclusion:	The audit team verified impact from the installation of signboard and based on inspection record, employee in Pulau Maria Estate does not disposed of waste behind their houses. The audit team made field visit and found the behind of employee house is clean, no waste disposal. Audit team has verified the correction and corrective action plan being implemented. NC Major closed out.		
Effectiveness Closure (for previous audit closed Critical NC):	During ASA-1.2, special inspection was implemented regularly by unit of certification. Auditor did not found any recurrence of the corrective action made. According to this, the NC closure of previous findings was effectively implemented.		

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2292547-202212-M2	Issued Date	23/12/2022

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Due Date	22/03/2023	Closure Date	20/03/2023
Indicator & Category (Critical / Minor)	7.3.3 Minor escalated to Major		
Statement of Nonconformity:	The CH cannot demonstrate the proper domestic waste disposal (without open fire/burning)		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	Based on a field visit at Pondok Coklat Housing, Pulau Maria Estate, it was found that domestic waste was disposed using open burning/fire.		
Corrections:	Conduct special inspection and cleaning of the houses that do not throw domestic waste and burning domestic waste in the available bin, every 2 months.		
Root Cause Analysis:	There is no sudden inspections and visits by management (all staff and security) in the last 2 years due to the COVID 19 pandemic, thereby reducing the awareness of residents of housing, causing indiscipline in waste management, including the use of fire.		
Corrective Actions:	Making sign board regarding the disposal of domestic waste and including hazardous waste which is often used; Make a plan for a routine schedule of employee housing inspections signed by all staff and managers.		
Assessment Conclusion:	The audit team verified impact from the installation of signboard and based on inspection record, employee in Pulau Maria Estate does not dispose of waste behind their houses and not burning domestic waste. The audit team made field visit and found the behind of employee house is clean, no waste being burned, no trace of waste burning. Audit team has verified the correction and corrective action plan being implemented. NC Major closed out.		
Effectiveness Closure (for previous audit closed Critical NC):	During ASA-1.2, special inspection was implemented regularly by unit of certification. Auditor did not found any recurrence of the corrective action made. According to this, the NC closure of previous findings was effectively implemented.		

Previous Audit Minor Non-conformity			
NCR Ref #	2292547-202212-N1	Issued Date	23/12/2022
Due Date	ASA-1.2	Closure Date	29/11/2023
Indicator & Category (Critical / Minor)	2.1.2 Minor		
Statement of Nonconformity:	Documented system related evaluation of track changes to the law with relevant regulation was not implemented appropriately.		
Requirement Reference:	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.		
Objective Evidence:	- Peraturan Pemerintah No. 22 Tahun 2021 tentang Penyelenggaraan Perlindungan dan Pengelolaan Lingkungan Hidup was not listed and evaluated. This is related to Hazardous Waste license which has been expired since 22		

	November 2022 and should follow the requirement refer to Article 295 and 296 within this regulation. - Peraturan Pemerintah No. 36 Tahun 2021 tentang Pengupahan was not listed. This is related document of "Perjanjian Kerja Bersama" where not been approved by relevant government department. The context of "Perjanjian Kerja Bersama" should be considered to follow the requirements of this regulation.
Corrections:	The management unit coordinates with SSL Officer in Head Office Medan to revise and completing the legal list "Evaluasi Kepatuhan Hukum" and inform the possible changes/new activity to be done in compliance with changes in relevant regulation. To put more detail on new activity and/or license to fulfilled in order to review the impact and provide feedback to the said document.
Root Cause Analysis:	PIC for legal evaluation is not proactive in task related to identify changes, update the document, evaluate impact and provide feedback to the legal list document.
Corrective Actions:	Reiterate and emphasize PIC for public relations in form of memorandum from top management at site. The memorandum including information on seek information and evaluate changes in relevant laws/regulation in each management unit.
Assessment Conclusion:	The audit team verified the updated list of applicable law and regulation, January 2023. The audit team have verifying of new regulation sample randomly. The new and updated of regulation has been updated. Audit team has verified the correction and corrective action plan being implemented. NC Minor closed out.

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)
Recertification Assessment (Remote Audit)				
1933967-202007-M1	Critical	6.2.2	15/07/2020	Closed on 21/09/2020
Recertification Assessment (Onsite Audit)				
2097225-202108-M1	Critical	6.7.3	21/08/2021	Closed on 15/11/2021
2097225-202108-N1	Minor	3.2.2	21/08/2021	Closed on 15/11/2021
2097225-202108-N2	Minor	6.7.2	21/08/2021	Closed on 15/11/2021
2097225-202108-N3	Minor	7.3.2	21/08/2021	Closed on 15/11/2021

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CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2097225-202108-N4	Minor	7.3.3	21/08/2021	Closed on 15/11/2021
2097225-202108-N5	Minor	7.12.7	21/08/2021	Closed on 15/11/2021
ASA-1.1				
2292547-202212-M1	Minor escalated to Major	7.3.2	23/12/2022	Closed on 20/03/2023
2292547-202212-M2	Minor escalated to Major	7.3.3	23/12/2022	Closed on 20/03/2023
2292547-202212-N1	Minor	2.1.2	23/12/2022	Closed on 29/11/2023
ASA-1.2				
2426063-202311-M1	Critical	3.4.3	29/11/23	21/02/24
2426063-202311-M2	Critical	3.6.2	29/11/23	21/02/24
2426063-202311-M3	Critical	6.2.3	29/11/23	21/02/24
2426063-202311-M4	Critical	6.7.3	29/11/23	21/02/24
2426063-202311-N1	Minor	2.1.3	29/11/23	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss **PT Saudara Sejati Luhur – Gunung Melayu I POM** Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal	Gender Committee	Face to face
Union	Worker Union	Face to face
Governmental Department	Asahan Regency Manpower Office Asahan Regency Lands Office	By phone

	Asahan Regency Agriculture and Plantation Office Asahan Regency Environmental Office	
Communities	Batu Anam Village	Face to face
NGO	LKLH (Lembaga Konservasi Lingkungan Hidup Sumatera Utara)	By phone

Stakeholders comment	
1.	<p>Feedbacks: Asahan Regency Manpower Office</p> <ul style="list-style-type: none"> - Wage determination is in accordance with the 2023 Asahan Regency Minimum Wage - All workers have been registered as BPJS Ketenagakerjaan and BPJS Kesehatan participants - There are no issues related to child or underage labor - The company has provided PPE to its workers according to their risk level. - The company has a valid permit for lifting and carrying equipment, pressure vessels, etc. including carrying out periodic inspections; and the operator has registered with the operator's license. - The company has formed a Workers Union and has been registered under the names PUK FSPPPSPSI and PUK KSPSI 1973 - During the 2023 period there were no reported industrial relations cases. - It is recommended that PP no. 35 of 2021 concerning Specific Time Work Agreements, Outsourcing, Working Time and Rest Time and Termination of Employment Relations. <p>Audit Team verification and response: Audit team has verified with indicator related to worker welfare, occupational health and safety and found aligned.</p>
2.	<p>Feedbacks: Asahan Regency Lands Office</p> <ul style="list-style-type: none"> - PT Gunung Melayu has a valid Land Title/HGU in 2004 and is still valid - Reporting related to the use of HGU has been submitted consistently - There were no issues related to land conflicts in this 3 year period. <p>Audit Team verification and response: The auditor team has verified the HGU certificate; 3. Land Title/Cultivation Rights (HGU): HGU Certificate No. 1 (23 Apr 2004); NIB: 02.07.02.17.00100 Reference: Decree of the Head of BPN No. 20/HGU/BPN/2001 (7 August 2001) and No. 20/HGU/BPN/2001/A/28 (19 Dec 2001). Measurement Letter No: 01/Gonting Malaha/2004, 21 Apr 2004. Area 10,414,331 Ha Field observations were carried out and it was observed that the maintenance of the boundary markers was well maintained and the use of the HGU land was in accordance with its intended purpose.</p>
3.	<p>Feedbacks: Asahan Regency Agriculture and Plantation Office</p> <ul style="list-style-type: none"> - PT Gunung Melayu had a Plantation Business License (SPUP) in 2001 and underwent changes in 201 regarding the addition of Mill capacity from 30 tons of FFB per hour to 60 tons of FFB per hour

	<ul style="list-style-type: none"> - The company has submitted a mandatory report on plantation business development in statistical format. - Partnerships have been established with farmers in villages around the plantation not using the Inti-plasma scheme - The company's FFB price is based on market prices, and is not binding on the FFB price determined by the North Sumatra Provincial Government. Based on community input, the FFB price set by PT Gunung Melayu has a better FFB structure compared to other companies in the area. - There are no issues related to land conflicts or complaints from the surrounding community. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - The audit team verified indicators related to legal compliance, support to small farmers, community development and found compliance. - Implementation of partnership programs through the CSV (Corporate Share Value) program; - Up to September 2023 there have been 18 smallholder groups/"farmer groups" with 867 smallholder members and 2,999 Ha area registered under the CSV program.
4.	<p>Feedbacks:</p> <p>Asahan Regency Environmental Office</p> <ul style="list-style-type: none"> - The company has an environmental permit, analysis documents regarding environmental impacts, environmental management and monitoring; and report its implementation to the Environmental Office every 6 months (per semester) consistently - The company has managed B3 Waste and has a legal temporary storage place for B3 Waste in accordance with regulations and has reported consistently every 3 months (quarterly) - There are no reports or issues regarding environmental pollution from factory and plantation operations from communities around the plantation. - there are environmental issues reported by the NGO LKLH Medan via social media: https://www.kabarriau.com/berita/9715/lklh-sumut-bangunan-kebun-sawit-pt-inti-indosawit-subur-bersertifikat-rspo-dan-iscc-di-duga” <p>Audit Team verification and response:</p> <p>Audit team verified against the indicator related to legal compliance, environmental management system, water quality and found in compliance.</p> <p>Regarding the issue raised by the NGO LKLH (Lembaga Konservasi Lingkungan Hidup Sumatera Utara) in August 2023, the auditor team has carried out verification via telephone to the Chair of the LKLH NGO, Mr. Indra Mingka.</p> <p>Based on verification and interview with NGO LKLH, the complaint has been respond by the Management of PT Gunung Melayu, the issue has been addressed and solved.</p> <p>During field visit to Piasa river border Block C10E Afdeling I Sentral Estate, it was noted that Sentral Estate has designated the Piasa river border as HCV area since HCV assessment 2014. The boundary of the HCV area, 50 meters wide from the river bank, has been marked and stakes have been installed. HCV information boards have also been installed at river border locations.</p> <p>It was noted that Piasa River border has include in the remediation plan of PT Gunung Melayu II POM.</p>
5.	<p>Feedbacks:</p> <p>Village communities Batu Anam Village</p> <ul style="list-style-type: none"> - Communication has been well established - The company is always open and responds well to every problem that occurs in society - The CSR program was created based on surveys and consultations with Batu Anam Village. Realized every year in accordance with the program that has been communicated.

	<ul style="list-style-type: none"> - So far there have been no land conflicts - There are no violations of human rights or forced labor and discrimination in its operations <p>The use of labor is prioritized for village communities around the plantation. And the surrounding village community feels helped</p>
	<p>Audit Team verification and response:</p> <p>Audit team verified against the indicator related to transparency, legal compliance, support to smallholder, community development and found in compliance. This comment recorded as positive comment.</p>
6.	<p>Feedbacks:</p> <p>Gender Committee</p> <ul style="list-style-type: none"> - The Gender Committee understands the mechanism for submitting complaints, including protecting anonymity, especially if harassment or violence occurs against female workers - The Gender Committee has an annual work program: meetings, socializing female workers' rights to female workers, holding training or general outreach to new mothers on plantations. - Routinely (every month) hold POSYANDU (Integrated Service Post) activities for mothers who have just given birth - Gender committee meetings are held every 3 months. Coordinating the activities of the PT gender committee. Mount Malay. - The company has demonstrated efforts to protect the rights of female workers: menstrual leave, maternity leave, special health checks for female workers in high-risk areas, pregnancy tests for sprayers and fertilizers. - To date, there have been no complaints regarding sexual harassment, domestic violence against female workers, and/or violations of women's reproductive rights.
	<p>Audit Team verification and response:</p> <p>The audit team verified indicators related to worker welfare, no discrimination, occupational health and safety, protection of women workers' rights, handling complaints and found compliance.</p> <p>Verify the rights of female workers regarding menstrual leave and maternity leave</p>
7.	<p>Feedbacks:</p> <p>Worker Union</p> <ul style="list-style-type: none"> - The normative rights of workers (wages, BPJS Employment and Health) have been implemented by the company - Members of this trade union are permanent workers (SKUH and SKUB), while non-permanent workers (PKWT and PKHL) have an Employment Contract drawn up. - Personal Protective Equipment (PPE) is provided to workers free of charge to all workers in the field - The company has provided facilities to workers in the form of housing, clinics, school buses, sports facilities, places of worship, lighting and clean water. - To date there are no indications of human rights violations, acts of violence, coercion, discrimination or use of child labor. - To date there have been no industrial relations cases <p>Implementation of PP no. 35/2021 related to providing compensation to PKWT after the contract period expires, has not been implemented by the company.</p>
	<p>Audit Team verification and response:</p> <p>Audit team verified against the indicator related to worker welfare, no discrimination, occupational health and safety, protection on female worker rights, complaint handling and found in compliance.</p>

	Regarding the implementation of PP no. 35/2021, indicator 6.2.3 in this report has been verified (and is a record of non-conformity (please refer to NC #2423887-202311-M1) that must be followed up).
8.	<p>Feedbacks:</p> <p>NGO LKLH (Lembaga Konservasi Lingkungan Hidup) Medan</p> <p>There was a complaint from the Medan Environmental Conservation Institute (LKLH) NGO which was submitted via letter directly to the Medan Head Office on 23 August 2023 and also via online media: https://www.kabarriau.com/berita/9715/lklh-sumut-besarkan-kebun-sawit-pt-inti-indosawit-subur-certified-rspo-dan-iscc-di-duga on 15 September 2023.</p> <p>PT Gunung Melayu has respond the letter from LKLH and the issue has been follow up and addressed by company.</p> <p>Complaint details are as follows:</p> <ol style="list-style-type: none"> 1) On August 23 2023, NGO LKLH sent letter No. 127/DPW/LKLH-SU/VIII/2023 to the Main Director of PT Inti Indo Sawit Subur in Medan, there are several things that are complained about: Conditions in the Piasa river border field which is directly adjacent to the PT Inti Indosawti Subur - PT Gunung Melayu Sentral Estate area (KSN) planted with oil palm so that it is damaged and not protected. So the NGO LKLH asked for clarification and commitment steps from PT Gunung Melayu regarding this matter. 2) The Piasa river border area in question is the Sentral Estate (KSN) area for palm oil plantations in the 2003/2004 planting year which is not included in the scope of RSPO certification and is still in the RaCP assessment process by the RSPO. 3) LKLH has carried out a field investigation on Monday 11 September 2023 to the Piasa river border, and it is true that the Piasa river border has been planted with oil palm by PT Gunung Melayu Kebun Sentral (KSN). 4) On September 17 2023, a meeting was held between PT Gunung Melayu, represented by Public Relations Mr. Agus Salim with NGO LKLH represented by Mr. Indra Mingka in Medan. 5) Furthermore, on September 19 2023, send another notification letter via letter No. 138/DPW/LKLH-Su/IX/2023 containing alleged environmental violations, namely not protecting and managing the protected area along the Piasa River, proven by converting it to oil palm plantations. Through this letter, LKLH also explained that PT Gunung Melayu / Asian Agri Group had made a clarification or explanation on Monday 18 September 2023 in Medan to DPW LKLH North Sumatra so that everything was clear and no misunderstanding were found, but the company would continue to improve the performance of environmentally friendly and sustainable palm oil plantations in accordance with RSPO principles. <p>PT Gunung Melayu has designated and conserve the river border of Piasa river in HCV management plan program. PT Gunung Melayu has planted 1500 trees for these woody plants. After replanting is carried out, the river border is remain conserve as HCV area and will be monitor regularly.</p> <p>The company has explained openly that the area (Piasa River Border) has been designated as a river border HCV area in the Central Plantation of PT Gunung Melayu and has indeed been planted with oil palm in the 2003/2004 planting year, and has been programmed to that after replanting, it will not be disturbed as an HCV area and wood trees will be planted in that area. The NGO LKLH will always monitor the area so that the HCV environment can be preserved.</p> <p>Audit Team verification and response:</p> <p>Regarding issues or complaints from NGO LKLH, the auditor team has carried out verification by contacting directly the head of NGO LKLH, Mr. Indra Martin.</p> <p>Based on this verification, the complaint has been respond by the Management of PT Gunung Melayu, the issue has been addressed and solved.</p> <p>During field visit to Piasa river border Block C10E Afdeling I Sentral Estate, it was noted that Sentral Estate has designated the Piasa river border as HCV area since HCV assessment 2014. The boundary of the HCV</p>

	area, 50 meters wide from the river bank, has been marked and stakes have been installed. HCV information boards have also been installed at river border locations. It was noted that Piasa River border has include in the remediation plan of PT Gunung Melayu II POM.
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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
N/A	N/A	N/A	N/A	N/A	N/A
The unit of certification has undergone 1 st replanting (second generation planting), therefore previous land owner interview is not Applicable.					

Previous land owner / user comment	
	Feedbacks: The unit of certification has undergone 1 st replanting (second generation planting), therefore previous land owner interview is not Applicable.
	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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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Saudara Sejati Luhur – Gunung Melayu I POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT Saudara Sejati Luhur – Gunung Melayu I POM is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Yudwi Wisnu Rahmanto	Name: Putu Grhyate Yonata Aksa
Company Name: BSI Services Sdn. Bhd.	Company Name: PT Saudara Sejati Luhur – Gunung Melayu I POM
Title: Team Leader	Title: Sustainability Manager
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: 22/02/2024	Date: 22/02/2024

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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.	The Certificate Holder has demonstrate the list of information that can be accessed by relevant stakeholders under document " <i>Daftar Dokumen Yang dapat diakses oleh Stakeholders</i> , Memorandum No. 12/GM-GME/Int/V/2021", updated on 17 May 2021, that covered: <ol style="list-style-type: none"> 1. Legal Documents - a copy of SK HGU (Land Title) - a copy of AMDAL (Social and Environmental Impact Assessment) - a copy of Operational Permit (IUP/SPUP). 2. Environment Documents - Hazardous waste storage permit - Waste management plans - Report of waste water - Report of water management - Report of river water quality - Report of air quality. - Report of RKL (Environmental Management Plan) – RPL (Environmental Monitoring Plan). - Report of Hazardous Waste - HCV Assessment 3. Social Activity Documents (<i>Rencana dan Realisasi Program CSR</i>). 4. Employment Documents. - <i>Jamsostek</i> and also <i>BPJS Kesehatan</i> - HSE management programs. 5. Certificate of land rights/cultivation rights (Criterion 4.4) – confidentiality – limited access. No update available. 6. Occupational Health and Safety plans (Criterion 3.6) – no update information because no additional activities. 	Complied

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		<p>7. Plans and impact assessments relating to environmental and social impacts (Criterion 3.4) - accessible</p> <p>8. High Conservation Value (HCV) documentation & High Carbon Stock (HCS) (if relevant) (Criterion 7.12) - accessible</p> <p>9. Pollution mitigation and reduction plan (Criterion 7.10) - accessible</p> <p>10. Details of complaints and grievances (Criterion 4.2) – confidentiality (limited access)</p> <p>11. Negotiation procedure (Criterion 4.6) - accessible</p> <p>12. Continuous improvement plan (Criterion 3.2) - accessible</p> <p>13. Public summary of the certification assessment report - accessible</p> <p>14. Human Rights policy (Criterion 4.1) - accessible</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>Company has a set of publicly available document in form of "<i>Daftar Dokumen Yang dapat diakses oleh Stakeholders</i>" as per Memorandum No. 12/GM-GME/Int/V/2021", updated on 17 May 2021. The provision of publicly available document segregates based on stakeholder category.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM was provided an information in appropriate languages (Bahasa Indonesia) it can be understood and accessible by relevant stakeholders.</p> <p>Based on interview with surroundings stakeholder (e.g. Head of Village, community group and contractor of transport FFB) it showed that they understood of that list.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	<p>The Certificate Holder has developed a communication procedure under "<i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i>" (No. SOP; AA-GL-5008.1-R1) dated 22nd August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will be responded according to respective authorities, starts from Humas (Public Relation), Estate/Mill manager,</p>	Complied

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		<p>Group Manager and Regional Office. The company has set time to respond information request on 14 working days.</p> <p>Request Information and response from Stakeholder has been documented into a log book "<i>Surat Masuk</i>" and the response is documented in "Log Book Stakeholders – Out". There were noted 15 information request and others from Stakeholder up to April 2021.</p> <p>Below are seen and verified sample:</p> <ul style="list-style-type: none"> • Report on Environment Management and monitoring (RKL-RPL) Report period July – December 2020, sent to Environment Agency of Asahan Regency on 24 June 2021. • Report on Environment Management and monitoring (RKL-RPL) Report period July – December 2020, sent to <i>Pusat Pengendalian Pembangunan Ekoregion Sumatera</i> (PPPEs) of Asahan Regency on 22 June 2021. • P2K3 Activities Report (Safety Committee report) Period January - March 2021, sent to Manpower Agency of North Sumatera Province on 10 April 2021. • P2K3 Activities Report (Safety Committee report) Period April - June 2021, sent to Manpower Agency of North Sumatera Province on 3 July 2021. • CSR and CSV Report 2020 sent to Agricultural Agency of Asahan Regency on 1 April 2021. • CSR and CSV Report 2020 sent to Regent of Asahan Regency on 1 April 2021. <p>All request information and others has been responded timely manner Personnel in Charge to monitor the records of information request and response is Public Relation Department (Humas) and KTU (Head of Administration) PT. Saudara Sejati Luhur both mill and estate.</p>	
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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>The Certificate Holder has developed a communication procedure under "<i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i>" (No. SOP; AA-GL-5008.1-R1) dated 22nd August 2011, <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (internal) SOP AA-HR-308.5-R1, dated 1 December 2019. Ensuring the anonymity profile, and <i>SOP Penanganan Keluhan Masyarakat</i> (SOP AA-GL-510.1-R0, dated 1 Jan 2013. SOP also explains the company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted.</p> <p>The company has nominated person Mr. Agus Salim Batubara (Public Affair Staff) as per "Memorandum Regional Head Plantation-1 No.071/HR-RO1/MEMO/02/17 <i>tentang Penugasan Sebagai Humas</i>" dated 25 February 2017 as Personnel in Charge related to consultation and communication with local communities and other stakeholders.</p> <p>Based on public stakeholder consultation with local contractor, NGO and public official, it was revealed that company has communicating in good manner. Company also provide response to information request in accordance to authority and the communication SOP.</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>List stakeholders are available, and records of stakeholders' communication and consultation were being documented into "Buku Masuk", the last updated in August 2023. The stakeholders list completed with name of chairman, address and contact number. List of information that can be access by relevant stakeholders available in Indicator 1.2.1.</p> <p>The list of stakeholder list updated annually by Public Relation. Last update performed in August 2023, consist of 25 stakeholders which related to company operations, as follows:</p> <ul style="list-style-type: none"> - Government institutions consist of surrounding Villages, District Head, and related Agency of Asahan Regency (Dinas Lingkungan Hidup, Dinas Pertanian and Perkebunan, Dinas Tenaga Kerja, BPN, BPPPM and BAKORTIBA). 	Complied

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		<ul style="list-style-type: none"> - Informal Institution around the company, e.g. DPC F-SP.PP SPSI Asahan, Public Figure, Worker Union and Gender Committee. - NGO around the company i.e.: Icon RI, Tipan RI, etc. 	
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>The company has had a corporate policy set on 1 December 2019 in Medan which has been ratified by the Managing Director (Kelvin Tio). The company's policy confirms the Code of Conduct behaviour in business at point 2); Policy on the conduct of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery and fraud in the use of funds and resources.</p> <p>In the employee selection process, the company has sets policies related the conduct of business ethics in the daily worker agreement (<i>Perjanjian Kerja Harian Lepas</i>), which is stated in the appendix to corporate policies and behaviours that must be complied with. PKB is a joint working agreement for permanent workers, also confirmed about the conduct of business ethics in article 16 related of the behaviour of the business ethics in the company.</p> <p>The company's policy is also published to use posters at any strategic places in the plantations (Pulau Maria Estate and Gunung Melayu I Mill). During interview with the sample of workers, it is informed that no recruitment fees impose during the employees recruited.</p>	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>Mechanism used to monitor the implementation of the company's policy, carried out by several methods, including: On workers conducted every morning before doing the work at 06.00 delivered by the field foreman (Mandor) concerned, this activity is referred to as "morning circle or Muster morning". At the time of revision of the contract with the contractor (because the validity period has expired), the company always resubmit to all contractors about the conduct of business ethics which is subsequently carried out contracts by the contractor.</p>	Complied

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		<p>In the event of changes or additions to the company's policy, the company will promptly deliver it, including updates to employment contracts and PKB and local employment contract documents.</p> <p>Based on the interview with some employees and stakeholders, that they have understood linked to the company's policy.</p>	
Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies to relevant regulations.	<p>In complying with applicable laws and regulations relating to company operations, PT Saudara Sejati Luhur has procedure of identification and evaluation of legal requirements "<i>Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya</i>" (SOP AA-GL-5001.1-R0), dated 5 December 2009. Person in charge to identify and evaluate is legal staff in coordinate with unit head.</p> <p>Apart from that, the Company has an evaluation document regarding regulatory compliance which is carried out second a year (January-June and July-December). There are more than 160 regulations contained in the PT Saudara Sejati Luhur's legal compliance evaluation.</p> <p>Legal requirements for PT SSL consist of:</p> <p>Organisation legal standing</p> <ul style="list-style-type: none"> - Company Deed: <ol style="list-style-type: none"> 1. No. 62 dated 20 March 1971, registered as PT. Saudara Sejati Luhur. 2. No. J.A.5/28/18 dated 15 February 1972, registered by Ministry of Justice. 3. Amended Company Deed (based on Extraordinary Shareholders Meeting): Deed No.10 dated 5 February 2020. Notary: Esther P.E. Jovina, SH, MKn. Approval Ministry of Laws and Human Right: 	Complied

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		<p>AHU-001461.AH.01.02.TAHUN 2020, dated 10 February 2020.</p> <p>- Company Tax Registration Number (NPWP): 01.139.030.9-073.000.</p> <p>Land Tenure and Land-Use Rights:</p> <p>HGU Certificate Number: 1, dated 29 April 2004. Ministry of Land Decree 154/HGU/BPN/2004, dated 11 November 2004. Valid until 31 December 2030. Area: 2,301.88 Ha.</p> <p>Plantation Permit:</p> <p>Surat Pendaftaran Usaha Perkebunan Nomor: HK. HK.350/539/Dj.Bun.5/VII/2001, dated 12 July 2001. Plantation area permitted: 2,319 Ha; Mill capacity: 30 MT FFB/hr.</p> <p>The company have approval letter from the relevant authorities to extend the Mill capacity upgraded to 60 MT FFB/hr as refer to ""Badan Pengelola Perizinan dan Penanaman Modal Kabupaten Asahan atas nama Bupati Asahan No. 503/IUP-PKIP/BPPPM/1772/VI/2015, tanggal 17 Juni 2015".</p> <p>Premises License:</p> <p>Ijin Tempat Usaha No. 503/SITU/BPP/06781/XII/ 2007 dated 27 December 2007.</p> <p>All the legal permit listed in the document "Evaluasi Kepatuhan Hukum PT Saudara Sejati Luhur". Updated regularly by the document control. The last updated in June 2023. All the documents are valid.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p>	<p>A documented system for ensuring legal compliance, Unit of Certification implement updating law and regulations periodically. An updating law and regulations was documented within "Evaluasi Kepatuhan Peraturan PT Saudara Sejati Luhur", on June 2023. There are 6 updated national regulation that were identified in 2023. Person in charge for updating this document is Administration Head with supported by Sustainability Team and Legal Department as evaluation team. For example:</p>	Complied

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		<ol style="list-style-type: none"> 1. <i>PermenLHK nomor 2 tahun 2021 tentang Tata Cara Penerbitan Persetujuan Teknis Dan Surat Kelayakan Operasional Bidang Pengendalian Pencemaran;</i> 2. <i>Peraturan Pemerintah nomor 35 tahun 2021 tentang Perjanjian kerja waktu tertentu, alih daya, waktu kerja dan istirahat, dan pemutusan hubungan kerja;</i> 3. <i>Peraturan Pemerintah nomor 36 tahun 2021 tentang Pengupahan;</i> 4. <i>Peraturan Pemerintah nomor 5 tahun 2021 tentang Penyelenggaraan Perizinan Berusaha Berbasis Risiko;</i> 5. <i>Peraturan Pemerintah nomor 22 tahun 2021 tentang Penyelenggaraan Perlindungan dan pengelolaan Lingkungan Hidup.</i> 6. <i>Peraturan Menteri Kesehatan nomor 2 tahun 2023 tentang Kesehatan Lingkungan.</i> <p>Evaluation for legal compliance to third parties is conducted by due diligence form prior add new third party contractors. There is no new additional third party contractors cooperates with unit of certification.</p>	
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	The boundary peg No. SSL-064 has been registered in the HGU monitoring of PT Saudara Sejati Luhur and is equipped with coordinates. However, during field observations to ensure the maintenance of boundaries on Pulau Maria Estate, the HGU peg No. SSL-064 could not be found.	Non-compliance
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available.	<p>Certificate holder has latest list of contractors for each unit, here's the detail:</p> <ul style="list-style-type: none"> - Gunung Melayu I POM: 4 Contractors - Pulau Maria Estate: 6 Contractors 	Complied

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		Contractor list has been in line with information in stakeholder list. All third party has been listed such as Civil contractor, electric contractor, etc.	
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.	<p>In contracts owned by companies and contractors, the company stipulates several clauses that must be fulfilled by the contractor, especially regulations set by the government, for example:</p> <ul style="list-style-type: none"> - Point 8 (a): Payment of wages in accordance with local government minimum wage provisions. - Point 8 (b): Guarantee that workers are not child workers, victims of human trafficking, forced labor or those prohibited by applicable labor laws and regulations. - Point 8 (c): Must maintain the sustainability of environmental functions. <p>The following are several examples of contractor work agreements that contain these legal requirements:</p> <ul style="list-style-type: none"> - Work Agreement with PT Teknik Jaya Abadi (No.345/E1KPM/12/22, 30 September 2023). - Work Agreement with Nawi Kora Nginda (No.195/E1KPM/06/23, 29 October 2023). - Work Agreement with Sandy Halim (285/E1KPM/10/23, 1 November 2023). <p>Based on the document review, contractors who have collaborations with the company, for example CV Graha Mandiri & PT Teknik Jaya Abadi, they have been able to show sufficient evidence that the contractors have complied with the applicable regulations such as BPJS (assurance) registered, tax paid, pay minimum wage and provided PPE for all workers.</p>	Complied

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		Based on those objective evidence, there are sufficient evidence that the contractors have complied with the applicable regulations.													
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	As explained in indicators 2.2.2, the work agreement already include clause related to prohibition to use child worker, forced and trafficked labour.	Complied												
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.															
2.3.1	(C) For all directly sourced FFB, Palm Oil Mill (POM) requires: <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>The directly sources FFB to Gunung Melayu 1 POM is only Pulau Maria Estate as supply base and it is under scope of certification. Geolocation is available in Section 1 in this report and proof of ownership is refer to indicator 4.4.1.</p> <p>The others FFB suppliers are come from indirectly sources (agents or collection centre) as describes in indicator 2.3.2</p> <ul style="list-style-type: none"> • 	Complied												
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	<p>Based on the explanation of indicator 2.3.1, there is a FFB collecting agent who sends FFB to Gunung Melayu I POM on behalf of PT Sawit Trading Sejahtera and UD Saudara 1. The company shows geolocation data and area size for each farmer who sells FFB to the collector. Here are some examples:</p> <p>UD Saudara 1</p> <table border="1"> <thead> <tr> <th>Farmer Name</th><th>Legal</th><th>Area (ha)</th><th>Geolocation</th></tr> </thead> <tbody> <tr> <td>Belong</td><td>SHM</td><td>15</td><td>2°50'40.72" N & 99°16'27.28" E</td></tr> <tr> <td>Parida</td><td>SHM</td><td>40</td><td>2°50'50.88" N & 99°16'46.70" E</td></tr> </tbody> </table>	Farmer Name	Legal	Area (ha)	Geolocation	Belong	SHM	15	2°50'40.72" N & 99°16'27.28" E	Parida	SHM	40	2°50'50.88" N & 99°16'46.70" E	Complied
Farmer Name	Legal	Area (ha)	Geolocation												
Belong	SHM	15	2°50'40.72" N & 99°16'27.28" E												
Parida	SHM	40	2°50'50.88" N & 99°16'46.70" E												

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Fajar	SHM	20	2°51'16.83" N & 99°17'35.26" E
	<i>Surat Camat</i>	25	2°50'47.66" N & 99°16'35.10" E
PT Sawit Trading Sejahtera			
Farmer Name	Legal	Area (ha)	Geolocation
Sikun	SHM	7	2°36'49.2" N & 99°29'02.2" E
Supri	SHM	10	2°36'49.0" N & 99°28'58.6" E
Denan	SHM	7	2°36'48.7" N & 99°28'54.2" E
Hasan	<i>Surat Camat</i>	5	2°36'49.1" N & 99°28'50.0" E
The indirect supplier data also contains land ownership information for each farmer, consisting of SHM (ownership certificate), SKGR (Compensation Certificate) and sub-district head letter.			
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.			

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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.	<p>The company has a long-term plan in the Business Plan Document Estimate year 2023-2028 (5 years period) which was approved by the estate/mill manager. This document contains information related to long-term plans for each unit and various indicators, for example production targets, use of upkeep & harvesting costs, planting area, and cost allocation. The following is an example of a long-term unit plan:</p> <table><tr><td>Descripti on</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>FFB (Ton)</td><td>379,780</td><td>380,172</td><td>381,113</td><td>383,112</td><td>383,774</td></tr><tr><td>CPO (Ton)</td><td>89,179</td><td>88,957</td><td>90,103</td><td>91,392</td><td>92,129</td></tr><tr><td>PK (Ton)</td><td>12,739</td><td>12,759</td><td>12,905</td><td>13,072</td><td>13,360</td></tr></table>	Descripti on	2024	2025	2026	2027	2028	FFB (Ton)	379,780	380,172	381,113	383,112	383,774	CPO (Ton)	89,179	88,957	90,103	91,392	92,129	PK (Ton)	12,739	12,759	12,905	13,072	13,360	Complied
Descripti on	2024	2025	2026	2027	2028																						
FFB (Ton)	379,780	380,172	381,113	383,112	383,774																						
CPO (Ton)	89,179	88,957	90,103	91,392	92,129																						
PK (Ton)	12,739	12,759	12,905	13,072	13,360																						
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<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><td>Estate</td><td>2024 (ha)</td><td>2025 (ha)</td><td>2026 (ha)</td></tr><tr><td>Pulau Maria</td><td>399</td><td>424</td><td>191</td></tr></table> <p>The replanting plan will be carried out early in 2024 for each estate for plants that are over 20 years old.</p>	Estate	2024 (ha)	2025 (ha)	2026 (ha)	Pulau Maria	399	424	191	Complied																
Estate	2024 (ha)	2025 (ha)	2026 (ha)																								
Pulau Maria	399	424	191																								
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	Management review has shown through several documents, for example as follows:	Complied																								

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		<ul style="list-style-type: none"> - Management review records at Pulau Maria Estate on 16 October 2023. - Management Review records at Gunung Melayu I POM on 3 June 2023. <p>This management review activity discusses all matters related to the company's operational dynamics, for example internal audit results, process performance, consumer feedback, production achievements and continuous improvement. This activity was attended by all management representative from assistants and also unit managers.</p> <p>The management review conducted in periodically time depending on type of review, in example for replanting area progress is reviewed annually and monitored in monthly basis. Production review conducted in monthly basis.</p>	
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.	<p>The company has a record of implementing continuous improvement. This is a note in Kaizen Event Frame Work 2023. The document which contains, among others:</p> <ul style="list-style-type: none"> - Continuous Improvement (Kaizen) program related to EFB application with terrace shortcut at Pulau Maria Estate in October 2023. - Continuous Improvement (Kaizen) program related to provide toolbox for all station at Gunung Melayu I POM in July 2023. <p>The implementation of continuous improvements carried out by the company has considered 3 important points in sustainability, namely</p>	Complied

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		company profits (profit), employment (people) and also consideration of environmental and natural conditions (planet).	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Based on team auditor's review, the information has been matched with others document, such as supply chain record, demographic workers, etc.	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>In order to practice the best management of oil palm plants, the company has procedure and guidelines which are contained in the following procedures:</p> <ul style="list-style-type: none"> - AA-APM-OP-1100.01.R5 <i>Pembibitan</i> - AA-APM-OP-1100.02.R3 <i>Persiapan Lahan</i> - AA-APM-OP-1100.03.R2 <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> - AA-APM-OP-1100.04.R3 <i>Pembuatan dan Pemeliharaan Parit</i> - AA-APM-OP-1100.05.R3 <i>Konservasi Tanah Air</i> - AA-APM-OP-1100.06.R5 <i>Menanam Kacangan</i> - AA-APM-OP-1100.07.R6 <i>Menanam Kelapa Sawit</i> - AA-APM-OP-1100.08.R6 <i>Pengendalian gulma</i> - AA-APM-OP-1100.09.R8 <i>Pemupukan</i> - AA-APM-OP-1100.10.R10 <i>Pengendalian HPT</i> - AA-APM-OP-1100.11.R1 <i>Pestisida dan Pengolahannya</i> 	Complied

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		<ul style="list-style-type: none"> - AA-APM-OP-1100.12.R4 <i>Kastrasi</i> - AA-APM-OP-1100.13.R3 <i>Tunas Pokok</i> - AA-APM-OP-1100.14.R3 <i>Sensus dan Identifikasi Pokok</i> - AA-APM-OP-1100.15.R2 <i>Sensus Produksi</i> - AA-APM-OP-1100.16.R1 <i>Konsolidasi Pokok Tumbang</i> - AA-APM-OP-1100.17.R1 <i>Pengelolaan Air</i> - AA-APM-OP-1100.18.R3 <i>Potong Buah</i> - AA-APM-OP-1100.19.R1 <i>Pengelolaan Transport</i> - AA-APM-OP-1100.20.R8 <i>Peremajaan (Replanting)</i> - AA-APM-OP-1100.21.R2 <i>Riparian</i> - AA-APM-OP-1100.22.R0 <i>Pengelolaan Areal Nilai Konservasi Tinggi (NKT).</i> - AA-MPM-OP-1400.02-R2: Stasiun Penerimaan (FFB receiving station). - AA-MPM-OP-1400.03-R1: Stasiun Rebusan (Sterilizer station). - AA-MPM-OP-1400.04-R1: Stasiun Pemisahan Berondolan (Threshing station). - AA-MPM-OP-1400.05-R1: Stasiun pengadukan dan pengempaan (Pressing station). - AA-MPM-OP-1400.06-R1: Stasiun pemurnian (Clarification station). - AA-MPM-OP-1400.07-R1: Stasiun pemisahan nut dan fiber (Depericarper station). 	
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		<ul style="list-style-type: none"> - AA-MPM-OP-1400.08-R1: Stasiun kernel (Kernel station). - AA-MPM-OP-1400.09-R1: Stasiun boiler (Boiler station). - AA-MPM-OP-1400.10-R1: Stasiun engine room (Engine room station). - AA-MPM-OP-1400.11-R1: Stasiun water treatment (Water treatment station). - AA-MPM-OP-1400.12-R1: Laboratorium (Laboratory station). - AA-MPM-OP-1400.13-R1: Stasiun pengelolaan limbah (Palm oil mill effluent treatment). - AA-MPM-OP-1400.14-R2: Stasiun penimbunan dan pengiriman CPO dan kernel (CPO and PK bulking and dispatch operation). - AA-MPM-OP-1400.15-R1: Perawatan (Preventive maintenance). - AA-MPM-OP-1400.19-R2: Manajemen dan Metode Menghitung Emisi Gas rumah kaca (GHG management and mitigation). - AA-MPM-OP-1400.18-R4: Book Keeping. - AA-MPM-OP-1400.17-R6: Traceability. <p>Based on procedure documents review, field visit at harvesting Block and process activity in mill, it could be concluded that the oil palm agronomy, processing and safety procedures are still relevant with current situation and covers all main aspects from the field to the mill. All procedures are available in Bahasa. However, estates and mill employees understanding towards technical and safety matters is considered very satisfactory.</p>	
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3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>In order to ensure that field implementation is in accordance with established procedures, the company carries out routine internal audit activities for each unit. Here are some recordings:</p> <ul style="list-style-type: none"> - Internal Audit Sustainability Record on Pulau Maria Estate on 8 – 16 August 2023. - Internal Audit Sustainability Record on PKS Gunung Melayu I on 3 – 6 April 2023. <p>Based on that record, there's no non-conformities has been found from internal audit assessment.</p>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>The company has records in monitoring operational activities for each unit, here are some of them:</p> <p>Mill</p> <ul style="list-style-type: none"> - FFB Processing todate October 2023 : 131,316.66 ton - CPO Production todate October 2023 : 23,649 ton - PK Production todate October 2023 : 6,837 ton - EFB Production todate October 2023 : 22,986 ton - POME Production todate October 2023 : 69,111 ton - CPO FFA Average todate October 2023 : 3.47% - Moist todate October : 0.24% - Number of Shift Hours : 3,202 hrs - Mill Throughput : 60,6 ton/hrs - Oil Extraction Rate : 18,01% - Kernel Extraction Rate : 5.21% 	Complied

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		<p>Estate</p> <ul style="list-style-type: none"> - Pulau Maria Estate FFB production todate October 2023 : 32,846 ton - Pulau Maria FFB grading average todate October 2023 : Raw 0%; Ripe 97.06%; Overripe 3%. - Harvesting internal : 8.9 days <p>Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.</p>	
Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p>There were no changes related to the environmental permits held by the company at the time of surveillance audit 1.2, the environmental permits were still the same as the results of the previous year's surveillance audit. PT. Saudara Sejati Luhur has approved environmental impact assessment in form of "Dokumen Studi Evaluasi Lingkungan (SEL) Perkebunan dan Pabrik Kelapa Sawit PT Gunung Melayu, PT Saudara Sejati Luhur dan PT Sumber Sawit Makmur di Kabupaten Asahan – Sumatera Utara", prepare by CV Andalen Persada Konsultan in 1994. The assessment team for AMDAL has meet the requirements at the time, comprise of:</p> <ul style="list-style-type: none"> • Team Leader: Dr. Hemat R. Bramana, MSc • Coordinator: Ir. Juliarto Barus, MS (AMDAL A/B) • Agronomy/Soil science: Ir. Bahtera Purba and Ir. Jansen Sinulingga • Water and air quality: Drs. Ahmad Darwin, MSc (AMDAL A) and Drs. Satriana 	Complied

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		<ul style="list-style-type: none"> • Social, economy, culture: Abdul Rahman SH, MH, and Drs. Johaness Karo-Karo • Production technology: Dr. R. Kamrol D, MSc and Renalson • Water biology: Dra. Retno Widhiastuti and Drs. Mimpin Ginting, MS • Machinery technic: Ir. Rejeki Maha and Juna B • Programmer: Drs. Sehat Sembiring and Roshermida <p>The said environmental impact assessment document was approved through "Surat Komisi Pusat AMDAL, Departemen Pertanian No.220/687/B/IV/1994" dated 18 April 1994. The document has described the positive and negative impact from oil palm plantation and palm oil mill construction and development from pre-operation phase until operational, in Gunung Melayu.</p> <p>PT. Saudara Sejati Luhur has demonstrated environmental document for capacity upgrade "Upaya Pengelolaan dan Pemantauan Lingkungan (UKL-UPL) Pekebunan Kelapa Sawit, Peningkatan Kapasitas Produksi Pabrik CPO 60 Ton TBS/Jam dan Pembangunan Pabrik KCP 200 Ton/Hari dan Biogas Plant". The environmental permit approved through "Keputusan Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara No.660.1/0779/LH/2015 tentang Izin Lingkungan PT. Saudara Sejati Luhur", dated 17 June 2015.</p> <p>PT. Saudara Sejati Luhur –Gunung Melayu I POM has identified/evaluate the environmental aspect and impact as documented under "Evaluasi Aspek dan Dampak Lingkungan", latest review 7 January 2020 in each operating unit, plantation and mill.</p> <p>Social impact assessment for PT. Saudara Sejati Luhur explained under "Laporan Identifikasi dan Upaya Kelola Sosial" including the impact</p>	
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		<p>assessment, prepared in 2017. Company has also issued a report on social management effectiveness, prepared by Tim Corporate Social Responsibility in year 2017, titled "Laporan Efektivitas Upaya Pengelolaan Sosial PT. Sejati Saudara Luhur – PKS Gunung Melayu I, Kabupaten Asahan, Provinsi Sumatera Utara".</p> <p>The social impact assessment describing the condition: social interaction, organization, community structure, local community livelihood, economic impact, health condition, education, presence of worker union, presence of gender committee. During the preparation of document, management and assessment team involving community through interview and meetings with village peoples, smallholders, village authorities, regency authorities, etc. Record of meeting with impacted stakeholders available and demonstrated. Social impact assessment carried out 25-29 April 2017.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM carried out meeting with stakeholders, surrounding communities and they filled up questionnaire on May 2018. Record sighted: 4 questionnaires filled up "Kuesioner Pendapat Masyarakat Sekitar Kegiatan Usaha" dated 14 May 2018 to villagers of Dusun VIII Batu Anam village, Dusun VI Sidomulyo village, Dusun III Gonting Malaha village, from Bandar Pulau district. The questionnaire discussing social relation between company and community, basic needs, information transparency, job vacancy and/or opportunity for business/economic development, input/comments, grievance handling satisfaction, environmental impact, community perception.</p> <p>On 4 February 2023, PT. Saudara Sejati Luhur - Gunung Melayu I POM carried out consultation meeting to review social impact management program with Batu Anam village, Gonting Malaha village, Sidomulyo village. Document under "Berita Acara Review Efektivitas Penilaian Dampak Sosial PT Saudara Sejati Luhur – POM Gunung Melayu I", dated 4 February 2023. The meeting attended by 19 villagers. Photograph evidence provided.</p>	
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		<p>Apart from that, the company has carried out a reassessment of the social impacts at PT. Saudara Sejati Luhur covers the villages around the company and all housing for employees, staff and management of PT. Gunung Melayu, in collaboration with the "Lingkar Komunitas Sawit (LINKS)", assessment activities have been carried out starting in June 2022 and were completed and signed in June 2023 as stated in the PT Saudara Sejati Luhur Social Impact Assessment (SIA) Report. The report contains a description of the social impacts, external impacts in the form of direct positive impacts, indirect positive impacts, direct negative impacts and indirect and accumulative negative impacts. Internal social impacts consist of positive social impacts and negative social impacts.</p> <p>The SIA report also contains Recommendations for the Social Management Plan (RKS) and Social Monitoring Plan (RPS). Which will be the basis for implementing management and monitoring of the company's social impacts (Implementation will start in 2024).</p>	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.	<p>PT. Saudara Sejati Luhur-Gunung Melayu I POM assigned the mill manager and estate manager as PIC for environmental management and monitoring. Company consistently prepares environmental management and monitoring performance and submitted to Environmental Office. Sighted the report for period 2021 and Semester I year 2022:</p> <ul style="list-style-type: none"> - Report of Environmental Management and Monitoring Implementation "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) has been submitted to Environmental Department Dinas Lingkungan Hidup dan Kehutanan Provinsi Sumatera Utara, Periode July-December 2022". The report sent 21 february 2023. - Report of Environmental Management and Monitoring Implementation "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) has been submitted to Environmental Department Dinas 	Complied

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		<p>Lingkungan Hidup dan Kehutanan Provinsi Sumatera Utara, Periode Januari – Juni 2023”. The report sent 3 November 2022.</p> <p>The report has explained the effectiveness evaluation of the environmental management and monitoring plan.</p> <p>In year 2022, company carried out consultation on final document Social Impact Assessment with NGO Lingkar Komunitas Sawit/LINKS, after field verification with communities 5-24 August 2022.</p> <p>The Social Impact Assessment document prepared into social impact management plan, the arrangement assisted by LINKS with inputs from stakeholders: village communities, authorities, and regency authorities.</p> <p>The company has carried out a reassessment of the social impacts at PT. Saudara Sejati Luhur covers the villages around the company and all housing for employees, staff and management of PT. Saudara Sejati Luhur, in collaboration with the “Lingkar Komunitas Sawit (LINKS)”, assessment activities have been carried out starting in June 2022 and were completed and signed in June 2023 as stated in the PT. Saudara Sejati Luhur Social Impact Assessment (SIA) Report. The report contains a description of the social impacts, external impacts in the form of direct positive impacts, indirect positive impacts, direct negative impacts and indirect and accumulative negative impacts. Internal social impacts consist of positive social impacts and negative social impacts.</p> <p>The assessment has involved the surrounding village communities of Batu Anam Village, Batu Anam Village and Pulau Maria Village as well as company employees in plantation and mill operational units.</p> <p>The results of the assessment include 5 Social Management Plan (SRP) recommendations and 4 Social Monitoring Plans (PSP). Which will be the basis for implementing the management and monitoring of the company's social impacts in the coming year.</p>	
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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>The document for SEIA monitoring plan, implementation report and correction plan (if findings raised) included in the environmental report which prepared and submitted to Environmental Office.</p> <p>The impacted parties can convey their view through representative or their spoke person - freely chosen during impact identification, review finding and mitigation plan. The social impact assessment carried out through focus group discussion, in-depth interview, structured interview and field observation.</p> <p>The social impact assessor and management has involved community participation from preparation stage: with village communities, village authorities and regency authorities.</p> <p>The stakeholder consultation process was carried out with assistance from SIA consultant named LINKS. LINKS made field verification to review SIA plan through interview, FGD, meeting with surrounding village date 5-24 August 2022.</p> <p>The company has carried out a reassessment of the social impacts at PT. Saudara Sejati Luhur covers the villages around the company and all housing for employees, staff and management of PT. Saudara Sejati Luhur, in collaboration with the "Lingkar Komunitas Sawit (LINKS)", assessment activities have been carried out starting in June 2022 and were completed and signed in June 2023 as stated in the PT. Saudara Sejati Luhur Social Impact Assessment (SIA) Report. The report contains a description of the social impacts, external impacts in the form of direct positive impacts, indirect positive impacts, direct negative impacts and indirect and accumulative negative impacts. Internal social impacts consist of positive social impacts and negative social impacts.</p> <p>The assessment has involved the surrounding village communities of Batu Anam Village, Batu Anam Village and Pulau Maria Village as well as company employees in plantation and mill operational units.</p>	Non-compliance
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		<p>The results of the assessment include 5 Social Management Plan (SRP) recommendations and 4 Social Monitoring Plans (PSP). Which will be the basis for implementing the management and monitoring of the company's social impacts in the coming year.</p> <p>The company has presented the environmental permit implementation report (RKL-RPL) for oil palm plantation activities of CPO production of KCP plant and biogas plant for PT Saudara Sejati Luhur for the second semester of 2022 and the first semester of 2023, the report has discussed all important impacts requested in the matrix, including the results of evaluation of laws and regulations, evaluation of trends and evaluation of critical levels.</p> <p>The report has been reported to the relevant agencies periodically every semester, to the Environment and Forestry of North Sumatra Province, the Agriculture Office of Asahan Regency. The report for the second semester of 2022 was made on 21 February 2023 and for the first semester of 2023 was reported on 3 November 2023.</p> <p>The company has a SIA document "Report on the Effectiveness of Social Management Efforts of PT Sejati Saudara Luhur - Gunung Melayu II Palm Oil Mill, Asahan Regency, North Sumatra Province" in 2017 which includes a social impact management programme, but the company cannot show the report on the implementation of the social impact management programme. This is a non-conformity.</p>	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.	PT Saudara Sejati Luhur – Gunung Melayu I POM has established the procedure related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding " <i>Penerimaan Karyawan Baru</i> " (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker.	Complied

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		<p>The procedure is available in Bahasa Indonesia Language and has been communicated to all workers. The procedure and its content already comply with applicable laws and regulation in Indonesia related workforce/employment. This procedure were communicated to all employees in the workplace and stakeholders. Last socialization conducted in February 2021.</p> <p>During the process recruitment the company directly calls prospective employees to be conducted interviews and explanations related to employee status, rights and obligations to be done. It is also explained related to the procedures or processes and stages of employee recruitment to prospective workers. If the employee is accepted as an employee of PT Saudara Sejati Luhur, the company will be created a working agreement document (PHL or PKWT working agreement). Signed by both parties and the document made by 2 copies, where each party (company and worker) gets 1 copy of the Working Agreement document. The company will explain that, the company has a policy on discrimination.</p>	
3.5.2	Employment procedures are implemented and records are maintained.	<p>Based on interview with workers, there is no indication that company being discriminative towards the employees: rice benefit provided as per standard (number of dependent), working tools provided for worker – based on activity, PPE provided for worker – based on risk assessment.</p> <p>PT Surya Sejati Luhur – Gunung Melayu I POM has conducted regular evaluation against all of employees, as one aspect considered for promotion and conducted talent test prior to promotion.</p> <p>In 2021, there was no recruitment process for new employee.</p> <p>According SOP: AA-HR-305.2-R0 dated 1 February 2009 related to Recruitment and Selection of Employee, the company will accept new employee based on their capabilities and qualifications.</p>	Complied
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

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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>In accordance with OHS policy that was issued and signed by the Managing Director on 1 December 2014. Under Point 3. Stated <i>"Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation"</i>.</p> <p>Unit of certification conducted the OHS risk assessment review annually. The OHS risk assessment procedure refer to "SOP Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian" Number AA-SMK3-02-R0 dated 3 August 2017 was established and implemented for Mill and Estates activities both routine and non-routine activities. Hierarchy of control has considered on planning of risk control.</p> <p>The last risk assessment review was conducted on January 2023 covering for all activities both in Gunung Melayu I POM and Pulau Maria Estate. Such as: mill (boiler operation, sterilizer operation, generator set operation, loading ramp activity, cleaning of CPO storage tank) and estate (chemical mixing, fertilizer warehouse, herbicide and pesticide sprayer, harvesting, road maintenance, HCV Monitoring, Boundary Monitoring, land application maintenance).</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared and documented the OHS Plan as in "Program Management K3 Tahun 2023", such as:</p> <ul style="list-style-type: none"> • Training on emergency response and preparedness • Training on implementation OHS management system (SMK3) • Implementation of risk assessment • Zero Accident and consistent on using of PPE • Review of accident report • Medical checkup for workers and provision of first aid kit • Safety committee meeting 	Complied
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		<ul style="list-style-type: none"> OHS inspection <p>In example: FFB loading at block platform. Hazard: mechanical (injuries); Risk control: administration (safety talk and work instruction); Mitigation plan: using PPE (helmet, gloves, safety shoes); Alternative control: mechanical loading. during field inspection to harvesting block at Division 1 Pulau Maria Estate, FFB loader is complete wearing PPE as Risk control required.</p>	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	<p>In order to evaluate effectiveness of H&S plan, unit of certification has demonstrated the record on monitoring effectiveness of the H&S plan to address health and safety risks.</p> <p>Unit of certification has prepared the program of OHS program 2022 - 2023 such as:</p> <ul style="list-style-type: none"> OHS meeting (in a monthly basis) Report of OHS performance to Manpower Agency (threes month base) General Medical Check Up (annually) and Special Medical Check Up (per threes month base) Socialization of healthy life (every month) Routine inspection of OHS facilities (fire extinguisher and first aid box) Integrated fire drill (annually) Training for first aider (annually) Training on hazardous waste both of handing and documentation Review of risk assessment (annually) <p>Training conducted:</p> <ul style="list-style-type: none"> Basic safety training, 11 September 2023 Basic fire training, 23 February 2023 PPGD and First Aid 8 July 2023 	Non-compliance

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		<p>Based on field visit to the harvesting activity in estate concluded that all the harvester has equipped with appropriate PPE such as safety boot (rubber), helm and google. Other than that, they also used the chisel cover to avoid accident during moving to another harvesting plot.</p> <p>However, during field visit to Gunung Melayu 1 Mill sighted that Fire emergency response facilities are not properly monitored. In example:</p> <ul style="list-style-type: none"> - Hydrant hoses and nozzles are not available in Box No.2 (Sterilizer Station) - The hydrant hose is damaged in Box No. 4 (Kernel Station) <p>This is causes non-conformity raise.</p>	
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has a department which is responsible for the training program, which is the Asian Agri Learning Institute.</p> <p>Training program has been developed by company both mill and estate as per "Kalender Pelatihan Tahun 2022-2023 Learning & Development". Training program developed to enhance the hard skill and soft skill for employee and staff, such as:</p> <ul style="list-style-type: none"> • Basic Safety training on 11 September 2023 (attended by 37 workers) • Fire drill. Training on 23 February 2023 (attended by 75 workers) 	Complied
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Through its employee data (master of Employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p> <p>Based on interview with sample of worker Jefri Lubis (Mill processing worker), he is attend the fire drill and basic fire handling on 23 February</p>	Complied

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		2023. Refer to attendance list, his name and other 74 workers are attended.	
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>PT Saudara Sejati Luhur – Gunung Melayu POM has prepared a training program to staff, who are involved in RSPO Supply Chain Certification Standard implementation. As per training program, "Program Pelatihan Environmental & Sustainability Tahun 2023" the RSPO supply chain training and awareness is planned on April 2023. Actual training RSPO SCCS has been conducted on 24 April 2023.</p> <p>Competency and training records of all staff involved in RSPO Supply Chain were able to be demonstrated.</p> <p>Training attend by participants: Mill Manager, production clerk, weighbridge clerk, KTU/administration, Dispatch and Sustainability team. Evidence of training can be demonstrated (note of training, photo and attendance list). During interview with weighbridge Clerk, mill manager, dispatch operator and KTU (head of administration) confirmed that they has understanding on RSPO supply chain.</p>	Complied
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	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Based on document review and interview to the Mill Manager, it was known that Gunung Melayu I Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is CPO Mills: Mass Balance.</p> <p>Not Applicable.</p>	Not Applicable

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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>PT. Saudara Sejati Luhur – Gunung Melayu I POM holds current RSPO P&C Certificate No. RSPO 620755, first certification start on 7 September 2015 and current certificate is issued on 21/03/2022 and expired on 20/03/2027.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate namely Pulau Maria Estate.</p> <p>The proportion of non-certified FFB comes from third-party supplier (20 Supplier FFB). FFB Non certified approximately 98% from total FFB received by Gunung Melayu I POM.</p>	Not Applicable
3.8.3	<p>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>	<p>The estimated tonnage of certified CPO and PK that could potentially produced by PT. Saudara Sejati Luhur – Gunung Melayu I POM its recorded in RSPO Public Summary report, certificate and RSPO IT Platform.</p> <p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000002609, sub license ID CB90877.</p> <p>Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2023/2024:</p> <p><u>Forecast volume (Mar 2023 – Feb 2024)</u></p> <p>FFB : 34,512 MT</p> <p>CPO : 8,007 MT (OER: 23.20%)</p> <p>PK : 1,726 MT (KER: 5.00%)</p> <p><u>Actual FFB production volume received by Gunung Melayu I POM (Mar 2023 – Oct 2023)</u></p> <p>FFB: 75.01 MT</p> <p>CPO: 16.67 MT</p>	Complied

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		<p>PK: 3.81 MT</p> <p><u>Actual sold volume (Mar 2023 – Oct 2023)</u></p> <p>CPO: 16.67 MT, All volume Sold as ISCC</p> <p>PK: 0 MT, No CSPK sold</p> <p>99.72% certified FFB production from Pulau Maria Estate was send to Gunung Melayu II POM.</p>	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>PT. Saudara Sejati Luhur – Gunung Melayu I POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM has meet all registration and reporting requirements.</p> <p>RSPO IT Platform/PalmTrace account RSPO_PO1000002609, sub license ID CB90877.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. 	<p>PT. Saudara Sejati Luhur – Gunung Melayu I POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Buatan Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. 	Complied

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	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<ul style="list-style-type: none"> • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; - SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; - SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; - SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; - SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; - SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 Book Keeping - SOP AA-MPM-OP-1400.17-R7 Traceability 	
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		<p>PT. Saudara Sejati Luhur – Gunung Melayu I 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.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill Manager. In accordance with Group Manager Memorandum No. 308/SSL-GM/MEMO/12/2022 dated 1 December 2022 that appointed Maruli Tua Munthe as Supply Chain Personnel in Charge for Gunung Melayu I POM. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM has a procedures for receiving and processing certified and non-certified FFBs, as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019. However Gunung Melayu I POM is implementing MB for supply chain model.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to</p>	<p>PT. Saudara Sejati Luhur – Gunung Melayu I POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Internal audit for all scheme including RSPO SCCS also refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Latest internal audit SCCS has been conducted on 3 – 6 April 2023 by Internal audit dept. (Hendryk Kristian Simanjuntak, Ian Septian Arifin, Yohanes Simanjuntak). Internal audit report were evident, all issue raised</p>	Complied

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	management review at least annually. The mill shall maintain the internal audit records and reports.	<p>during internal audit has been followed up by Corrective Action. According to internal audit result there is no issue regarding RSPO SCCS.</p> <p>Management review conducted once a year as per SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020. Management review has been conducted on 3 June 2023. Input of management review consist of:</p> <ul style="list-style-type: none"> - Internal audit result - Customer feedback - Proses performance and product conformity - Status of Corrective and Preventive Action - Follow up previous management review - Change that could effect to the management system <p>Output of management review has include:</p> <ul style="list-style-type: none"> - Recommendation for improvement - Resources needed. <ul style="list-style-type: none"> • Record of internal audit and management review are maintain and kept in the office by KTU. 	
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>PT. Saudara Sejati Luhur – Gunung Melayu I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS", covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM receive FFB from certified and non-certified source. Certified source consist of own estate (Pulau Maria Estate). The proportion of Non-certified FFB comes from third-party supplier.</p>	Complied

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		<p>Mostly FFB certified from Pulau maria Estate was deliver to Gunung Melayu II POM.</p> <p>Document Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Sample seen for certified FFB receiving:</p> <ul style="list-style-type: none"> - Weighbridge ticket "Tiket Timbangan No.PGSA123200055" dated 6 July 2023, for 198 FFB bunches; nett weight 4,750 kg; from Afdeling 3 Block I07c, I07d Pulau Maria Estate; vehicle number BK8755BC; driver: Bayu Andi Syahputra, RSPO certificate No.RSPO620755. - Weighbridge ticket "Tiket Timbangan No.PGSA123200054" dated 6 July 2023, for 189 FFB bunches; nett weight 4,070 kg; from Afdeling 3 Block I06a, I07b, I07i Pulau Maria Estate; vehicle number BK9071FA; RSPO certificate No.RSPO620755. <p>Sample seen for non-certified FFB receiving:</p> <ul style="list-style-type: none"> - Weighbridge ticket "Tiket Timbangan No.PGSA523210021" dated 6 July 2023, for 423 FFB bunches; nett weight 7,193 kg; from PT Sawit Trading Sejahtera, ID supplier A131; vehicle number BK9824VM; driver: Gusmanto, commodity: FFB outside (non certified). - Weighbridge ticket "Tiket Timbangan No.PGSA523210020" dated 6 July 2023, for 138 FFB bunches; nett weight 2,347 kg; from PT STS-L, ID supplier A213; vehicle number BK8164VQ; driver: A. Hamid, commodity: FFB outside (non certified). - Weighbridge ticket "Tiket Timbangan No.PGSA523210018" dated 6 July 2023, for 543 FFB bunches; nett weight 9,234 kg; from PT STS-AK, ID supplier A217; vehicle number BK8396EV; driver: Megik, commodity: FFB outside (non certified). 	
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</p>	<p>During March – October 2023 there is no CPO and PK sold as RSPO certified. There is a certified CPO and PK sold as other scheme ISCC</p>	Complied

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	<p>information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p><u>Actual FFB production volume received by Gunung Melayu I POM (Mar 2023 – Oct 2023)</u></p> <p>FFB: 75.01 MT CPO: 16.67 MT PK: 3.81 MT</p> <p><u>Actual sold volume (Mar 2023 – Oct 2023)</u></p> <p>CPO: 16.67 MT, All volume Sold as ISCC PK: 0 MT, No CSPK sold</p> <p>99.72% certified FFB production from Pulau Maria Estate was send to Gunung Melayu II POM.</p>	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> 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. ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure 	<p>PT. Saudara Sejati Luhur – Gunung Melayu I POM did not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is PT. Buana Jaya Bersama and CV Pengangkutan Jaya.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM having legal ownership of material being transported by appointed outsourced companies.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM have a contract agreement with transporter as below:</p> <ul style="list-style-type: none"> - "Perjanjian Pengangkutan Nomor: 03/X/BJB-SSL/2023" dated 1 October 2023 between PT. Saudara Sejati Luhur – Gunung Melayu I POM and PT Buana Jaya Bersama. Contract transport for CPO & PK. - "Perjanjian Pengangkutan Nomor: 02/X/Jaya-SSL/2023" dated 4 June 2021 October 2023 between PT. Saudara Sejati Luhur – Gunung 	Complied

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	<p>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>Melayu I POM and CV Pengangkutan Jaya. Contract transport for CPO & PK.</p> <p>Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 point 1.m stated that "<i>Bersedia memenuhi persyaratan sistem sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor internal perusahaan dan auditor pihak eksternal dari badan sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan</i>" – Transporter are willing to comply with certification system of RSPO Supply Chain during transport material and willing to be audit by internal auditor company (PT. Saudara Sejati Luhur – Gunung Melayu I POM) and external auditor from Certification Body if necessary.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019"</p> <p>Internal control for CPO and PK delivery by contractor has made as well with:</p> <ul style="list-style-type: none"> ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time. ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. ✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal. 	
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		<p>However since Mar 2023 – Nov 2023 there is no CPO and PK certified RSPO delivery by Gunung Melayu I POM. CPO and delivery as conventional/non certified.</p> <p>During onsite audit confirmed that control for CPO and PK delivery has well implemented by Gunung Melayu I Palm Oil Mill. Interview with CPO and PK transporter from PT Buana Jaya Bersama indicated that they have aware and controled by PT. Saudara Sejati Luhur – Gunung Melayu I POM. Interview with transporter PT Buana Jaya Bersama (truck driver) was confirmed that the transporter are aware regarding the requirement of RSPO supply chain during transport. Handling during transport are well control, before loading – during transport – unloading was monitor by supervisor. Tank transport are cleaning before loading and after unloading. GPS are installed in each tank truck to monitor during transport until reach the destination.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>The mill has recorded the name and contact detail of all contractors, as record in contract agreement. During audit contract agreement are verified.</p> <p>During transport, the mill has legal ownership of the product delivered.</p>	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	<p>The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019".</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM informed the CB prior the audit through pre information audit checklist. During this audit ASA1.2 there is no new contractors.</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>The organization has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p>	Complied

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	<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>	<ul style="list-style-type: none"> - Laporan Harian Pabrik (Mill Daily Report); dated 31/12/2022 and 30/01/2023 - FFB delivery note - Weighbridge ticket for FFB receiving, CPO and PK delivery - Delivery Order - Sales contract - Shipping Announcement - Mass balance report period 2023: January – March, April – June, July – September, October – ytd November. - Internal audit RSPO SCCS and Management review <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>Gunung Melayu I POM uses Mass Balance Module for supply chain. Gunung Melayu I POM has record and balances all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK in a three-monthly basis, as shown in Book Keeping Mass Balance Report. Monthly report was generated from weighbridge card, summarized daily in mill daily report, summarized monthly in Mill Operation Summary, then summarized in Book Keeping Mass Balance Report as evidence in “Mass Balance Report Gunung Melayu I POM” period 2023: January – March, April – June, July – September, October – ytd November.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p> <p>According to Mass balance Report, Gunung Melayu I POM only deliver Mass Balance sales from a positive stock.</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>	<p>The organization is able to provided estimate volume of CPO and PK in a year period as in Budget FY 2023/2024 Production FFB, CPO and PK. The organization also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT. Saudara Sejati Luhur – Gunung Melayu I POM.</p> <p>Extraction rate is applied to provide reliable estimation of CPO and PK produced. For year 2023, the estimated extraction rate from FFB into CPO is 23.00%, whilst from FFB to PK is 5.00%. Based on Daily Production Figure as per 31 October 2023, actual extraction rate ratios from FFB into CPO is 22.08% (year to date 31 Oct 2023), whilst from FFB to PK is 5.17% (year to date 31 Oct 2023) OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>OER and KER are updated periodically to ensure accuracy against actual performance.</p> <p>The actual Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Figure. Unit of certification is able to demonstrate the work instruction for analysis of oil content. Sampled Daily Production Report to check the OER and KER. Sample seen: Based on daily report production dated 31 October 2023, actual OER and KER ytd 31 October 2023 are as follows: - OER = 22.08% - - KER = 5.17%</p>	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</p>	<p>Gunung Melayu I POM implement Mass Balance Module.</p> <p>This indicator is not applicable.</p>	Not Applicable

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	palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.		
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. Saudara Sejati Luhur – Gunung Melayu I POM has not made shipping announcement inside PalmTrace transaction since there is no RSPO certified CPO and PK sold during Mar – Nov 2023.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM has made remove RSPO certified product from their PalmTrace account:</p> <ul style="list-style-type: none"> - ST-TR-84cf9002-5426, product CSPO, supply chain model: Mass Balance, volume to remove 16.67 MT, removal date 30/09/2023 - ST-TR-748b62cb-68e3, product CSPO, supply chain model: Mass Balance, volume to remove 52.70 MT, removal date 30/03/2023 <p>All volume sold as ISCC</p>	Complied
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. Saudara Sejati Luhur - Gunung Melayu I POM 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> <p>RSPO Rules on Market Communications and Claims audited during internal audit.</p>	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	PT. Saudara Sejati Luhur – Gunung Melayu I (with the brand Asian Agri), the parent company of Gunung Melayu I POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com .	Complied
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status	Corporate communication in Asian Agri website:	Complied

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	<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>	<ul style="list-style-type: none"> • Display its RSPO membership status: On the website of Asian Agri, it was stated the company is RSPO Member since February 2006. • Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. • State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1st RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." • State the member's history with regards to the RSPO: Yes. In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. • Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company does not display RSPO Trademarks and corporate logo. <p>There is no change until ASA1.2</p>	
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	In the Asian Agri website, no RSPO corporate logo used.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in their 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)." 	In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in their own products.	Complied

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	<ul style="list-style-type: none"> • “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.” 		
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).”</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: “This reported figure is not audited through RSPO Certification”.</p>	PT Saudara Sejati Luhur – Gunung Melayu 1 POM is certified member.	Complied
Product-specific communications			

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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.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Saudara Sejati Luhur – Gunung Melayu I POM and their buyers. PT. Saudara Sejati Luhur – Gunung Melayu I POM stated in sales documents, e.g., Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK model MB.	Complied
5.1.2	Product-specific communications are voluntary.	PT Saudara Sejati Luhur – Gunung Melayu 1 POM not using RSPO logo in any documents on product.	Complied
51..3	a) 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.	PT Saudara Sejati Luhur – Gunung Melayu 1 POM not using RSPO label in any documents.	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 Saudara Sejati Luhur – Gunung Melayu 1 POM not using RSPO label or trademark in any documents.	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 <ul style="list-style-type: none">● RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field.● Both parties shall inform their certification body in writing about the agreement.	PT Saudara Sejati Luhur – Gunung Melayu 1 POM apply MB model, no certified product entering the mill unless from its supply base, Pulau Maria Estate.	Complied

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	<ul style="list-style-type: none">• The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer.		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	PT Saudara Sejati Luhur – Gunung Melayu 1 POM apply MB model, no certified product entering the mill unless from its supply base, Pulau Maria Estate.	Complied

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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. Saudara Sejati Luhur - Gunung Melayu I POM stating the supply chain model and certificate number under which the claim is being made. Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	PT. Saudara Sejati Luhur - Gunung Melayu I POM stating the supply chain model and certificate number under which the claim is being made. Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	PT. Saudara Sejati Luhur - Gunung Melayu I POM is not a distributor and/or wholesaler. Not applicable. Not Applicable
5.3 On pack claims		
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the	PT. Saudara Sejati Luhur - Gunung Melayu I POM is not producing or selling end-product to consumer. Not Applicable

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	product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.		
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT. Saudara Sejati Luhur - Gunung Melayu I POM is not producing or selling end-product to consumer.	Not Applicable
	<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. Saudara Sejati Luhur - Gunung Melayu I POM is not producing or selling end-product to consumer.	Not Applicable
	<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. Saudara Sejati Luhur - Gunung Melayu I POM is not producing or selling end-product to consumer.	Not Applicable
	<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. Saudara Sejati Luhur - Gunung Melayu I POM is not producing or selling end-product to consumer.	Not Applicable

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5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	PT. Saudara Sejati Luhur - Gunung Melayu I POM is not producing or selling end-product to consumer.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	PT. Saudara Sejati Luhur - Gunung Melayu I POM is not producing or selling end-product to consumer.	Not Applicable
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.	PT. Saudara Sejati Luhur - Gunung Melayu I POM is not producing or selling end-product to consumer.	Not Applicable
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.	PT. Saudara Sejati Luhur - Gunung Melayu I POM is not producing or selling end-product to consumer.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES (Delete Non Applicable Module)			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	The MB volume that can be sold is the certified CSPO and CSPK volume produced by PT. Saudara Sejati Luhur - Gunung Melayu I POM. Hence the CSPO and CSPK 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.	RSPO MB certified palm oil which produced from PT Saudara Sejati Luhur – Gunung Melayu 1 POM source is 100% from certified FFBs (Pulau Maria Estate)	Complied
Messaging			
	Messaging ALLOWED in storytelling in product-specific communications includes: <ul style="list-style-type: none"> [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. 	There is no labelling and trademarking used by PT. Saudara Sejati Luhur - Gunung Melayu I POM on their products. Not applicable.	Not Applicable

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	The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.		
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	<p>There is no labelling and trademarking used by PT. Saudara Sejati Luhur - Gunung Melayu I POM on their products.</p> <p>Not applicable.</p>	Not Applicable
Principle 4: Respect community and human rights and deliver benefit			
Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	(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>PT Saudara Sejati Luhur – Gunung Melayu I POM has had a corporate policy set on 1 December 2019 in Medan which has been ratified by the Managing Director (Kelvin Tio). The policy relating to human rights, is explained in point 13, stating that: "<i>The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age</i>".</p> <p>The policy is also published to use posters at any strategic places Pulau Maria Estate and Gunung Melayu I POM.</p> <p>Corporate policy has been socialized/dissemination to all levels of PT</p>	Complied

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		<p>Saudara Sejati Luhur employees and stakeholders (including local contractors)</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also had a policy related a Human Rights Defender (HRD), which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on 20 March 2020: "<i>Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment</i>".</p> <p>The socialization of this policy has been done to all employees in Pulau Maria Estate dated 23 February 2023.</p>	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Based on the interview with stakeholder and documents review with the internal stakeholder (labour union, gender committee and random worker in field) and external stakeholder (village head), there is no issues of violence or any form of harassment, mercenaries, and paramilitaries usage in the operations.	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	(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>Based on document verification and interview with internal stakeholders (labour union, gender committee) informed that the Human rights policy that has been published No.298/ES-KTS/Memo/08/14 dated 26th August 2014 which also covering ethics in business that stated that "ethical behaviour, Prohibition of all forms of corruption, bribery in the conduct or transaction business practices and fraudulent use of funds".</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM committed to protect Human Rights Defender in their operational area. Each violation against the policy can be reported to HRD Department, Internal Audit Department, or line manager.</p> <p>There is no record of Human Rights violation found.</p>	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	PT Saudara Sejati Luhur – Gunung Melayu I POM has established a mechanism to handle complaint from external party, as written in " <i>Mekanisme Penanganan Keluhan</i> " – complaint handling mechanism	Complied

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		<p>(Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</p> <p>These mechanisms have communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities in 4 April 2023 (stakeholder such as relevant authorities), 23 February 2023 (employees), June-July 2023 (local communities).</p> <p>Through this communication, PT Saudara Sejati Luhur – Gunung Melayu I POM explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion),</p> <p>The procedure on handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances were recorded in LogBook and in "<i>Formulir Pencatatan Keluh Kesah dan Ketidakpuasan</i>".</p> <p>Based on the interview with stakeholder and documents review with the internal stakeholder (labour union, gender committee and random worker in field) and external stakeholder (village head and previous landowners) all policy/procedures are in place and understood by all stakeholders. In addition, there is no illiterate parties found until this audit.</p> <p>Through the public consultation with village head and previous landowners obtained information that all the villagers acknowledge the grievance procedure. They can submit their complaint or grievance by their self or by village head/elders</p>	
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.	According to stakeholder consultation with relevant and affected stakeholder, there is no grievance received. However, if grievance is occurs then the stakeholder will keep informed the progress as the company procedure.	Complied

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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.	<p>The conflict resolution mechanism including timeline is depending on the status level, if its only between workers and the company then its following company procedure for internal.</p> <p>If complaints or grievances from external stakeholders and the status is unresolve, the complainant are free to appoint their representatives by their own choices.</p> <p>However, according to stakeholder consultation with relevant and affected stakeholder, there is no grievance received. However, if grievance is occurs then the stakeholder will keep informed the progress as the company procedure.</p>	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.	<p>The element of CSR program are not changes and its covering Social, Economy, Education, Health, Infrastructure and Environment.</p> <p>The company demonstrated CSR Program period 2022 and 2023 under "Budget Program CSR tahun 2022 dan 2023". For Budget year 2023 comprise of 6 aspects and 15 activities such as Aid for "Usaha PKK Desa Gonting Malaha", Donation for Musholla renovation in "SMP Negeri Satu Atap Desa Batu Anam", Donation for mosque construction in Pulau Maria village.</p> <p>CSR program are based on the results of consultation with local community, in example on donation for mosque construction in Pulau Maria village is based on consultation with the Pulau Maria head of village. The communication is face to face through the social committee meeting on 12 December 2022. The project planned in May 2023.</p> <p>-</p>	Complied
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			

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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>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>During the audit the unit of certification able to show legal ownership documents as below:</p> <ul style="list-style-type: none"> Land Use Title (HGU) Certificate of HGU issued by Kantor Pertanahan Asahan Regency no. 1 of 2004 dated April 29, 2004, in accordance with the Measure Letter no. 01/Rahuning/2004 dated April 27, 2004 with an area of 2,301.883 Ha and valid until December 31, 2030. Equipped with HGU Map Appendix with a scale of 1: 10,000. Plantation Permit (IUP) Surat Pendaftaran Usaha Perkebunan (SPUP) issued from Ministry of Agriculture No.HK.350/539/Dj.Bun.5/VII/2001, dated 12 July 2001. Permitted area is 2,319 Ha. <p>Palm crops in Pulau Maria Estate as supply base to Gunung Melayu 1 POM started to 2nd cycle/generation due to Ganoderma disease. First step replanting is commenced at 2008 (585 Ha) and second step replanting already started in January 2023 for area 252 Ha. Therefore, no land compensation and FPIC process occurs.</p>	Complied
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has</p>	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. The data and documents are still the same as the previous year's audit results. The company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the</p>	Complied

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	<p>been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>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 is Not Applicable for replanting period.</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 document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. The data and documents are still the same as the previous year's audit results. The company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>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 is Not Applicable for replanting period.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. The data and documents are still the same as the previous year's audit results. The company is an existing plantation</p>	

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		<p>company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>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 has been describe in SEIA document or AMDAL.</p>	
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. There is no land expansion. The data and documents are still the same as the previous year's audit results. The company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>PT. Saudara Sejati Luhur has legal ownership as Land Use Title or Hak Guna Usaha, completed with map "Peta Bidang Tanah" scale 1:10,000. This land title certificate issued based on Minutes of Multi-stakeholder "Risalah Panitia Tanah-B".</p> <p>There is no land expansion of PT Saudara Sejati Luhur.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p>	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. There is no land expansion. The data and documents are still the same as the previous year's audit results. The company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this</p>	Complied

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		<p>unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>PT. Saudara Sejati Luhur has legal ownership as Land Use Title or Hak Guna Usaha, completed with map "Peta Bidang Tanah" scale 1:10,000. This land title certificate issued based on Minutes of Multi-stakeholder "Risalah Panitia Tanah-B".</p> <p>There is no land expansion of PT Saudara Sejati Luhur.</p>	
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>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. There is no land expansion. The data and documents are still the same as the previous year's audit results. The company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>PT. Saudara Sejati Luhur has legal ownership as Land Use Title or Hak Guna Usaha, completed with map "Peta Bidang Tanah" scale 1:10,000. This land title certificate issued based on Minutes of Multi-stakeholder "Risalah Panitia Tanah-B".</p> <p>There is no land expansion of PT Saudara Sejati Luhur.</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>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. There is no land expansion. The data and documents are still the same as the previous year's audit results. The company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this</p>	Complied

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		<p>unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>FPIC is not necessarily needed for replanting period. 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 is Not Applicable for replanting period.</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.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there is no new planting or any new planting plan in PT Saudara Sejati Luhur.</p> <p>The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there is no new planting or any new planting plan in PT Saudara Sejati Luhur.</p> <p>The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion</p>	Complied

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	a documented, long-term and two- way process of consultation and negotiation.	<p>area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	
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.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there is no new planting or any new planting plan in PT Saudara Sejati Luhur.</p> <p>The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	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.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there is no new planting or any new planting plan in PT Saudara Sejati Luhur.</p>	Complied

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		<p>The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	
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.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there is no new planting or any new planting plan in PT Saudara Sejati Luhur.</p> <p>The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	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.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit,</p>	Complied

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		<p>there is no new planting or any new planting plan in PT Saudara Sejati Luhur.</p> <p>The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	
4.5.7	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p>	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there is no new planting or any new planting plan in PT Saudara Sejati Luhur.</p> <p>The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	Complied

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4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there is no new planting or any new planting plan in PT Saudara Sejati Luhur.</p> <p>The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	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.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p>	Complied

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		Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).	
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.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).</p>	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).	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results.	Complied

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		<p>The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that the surrounding communities feels company provide job vacancy to absorb manpower from surrounding village.</p>	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. There was no compensation made.</p>	Complied
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary</p>	Complied

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		measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).	
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.	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).	Complied
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land	Complied

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	any compensation was accepted following a documented process of FPIC.	<p>ownership / tenure, or land dispute. There is no land expansion. The data and documents are still the same as the previous year's audit results.</p> <p>The Company is an existing plantation company since 1970s, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>However, where there are land disputes occurs, unit of certification have mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in their procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has considered FPIC Guide for RSPO Member, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).</p> <p>Based on communication with affected stakeholders, including surrounding villages, land disputes/conflict in PT Saudara Sejati Luhur managed area.</p>	
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure, or land dispute. There is no land expansion. The data and documents are still the same as the previous year's audit results.</p> <p>The Company is an existing plantation company since 1970s, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>However, where there are land disputes occurs, unit of certification have mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in their procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015.</p>	Complied

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		<p>The mechanism has considered FPIC Guide for RSPO Member, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).</p> <p>Based on communication with affected stakeholders, including surrounding villages, land disputes/conflict in PT Saudara Sejati Luhur managed area.</p>	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure, or land dispute. There is no land expansion. The data and documents are still the same as the previous year's audit results.</p> <p>The Company is an existing plantation company since 1970s, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>However, where there are land disputes occurs, unit of certification have mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in their procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has considered FPIC Guide for RSPO Member, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).</p> <p>Based on communication with affected stakeholders, including surrounding villages, land disputes/conflict in PT Saudara Sejati Luhur managed area.</p>	Complied

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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).	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure, or land dispute. There is no land expansion. The data and documents are still the same as the previous year's audit results.</p> <p>The Company is an existing plantation company since 1970s, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>However, where there are land disputes occurs, unit of certification have mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in their procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has considered FPIC Guide for RSPO Member, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).</p> <p>Based on communication with affected stakeholders, including surrounding villages, land disputes/conflict in PT Saudara Sejati Luhur managed area.</p>	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.	<p>The company has a mechanism for determining the price of external FFB in the SOP for Purchasing External FFB (AA-MM-506.1-R4). The procedure informs the following:</p> <ul style="list-style-type: none"> - FFB purchase manager will create a price list for local POM and other sources for price comparison. Then the FFB Purchase Manager will calculate the price of FFB that can be 	Complied

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		<p>purchased based on the CPO and PK prices from the marketing party obtained from the CPO and PK tender.</p> <ul style="list-style-type: none"> - From the CPO and PK prices obtained, transport costs to the nearest port will be deducted along with tax calculations. After that, the CPO and PK prices will be multiplied by the OER produced by POM. - From the results of this multiplication, processing costs from the factory will be deducted which at the end of the month will be adjusted again according to the recorded processing cost realization. <p>The price approved by the Head of FFB Purchase will be conveyed to the FFB supplier.</p> <p>FFB price is made publicly available and displayed in entering mill gate. The FFB prices is applicable for non-certified sources, because Gunung Melayu 1 POM receiving FFB's from non-certified.</p>	
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	<p>The unit of certification have no Scheme Smallholders program and supply base is from own estate (Pulau Maria Estate). However, there are independent smallholders surrounding the plantations, but the FFB pricing is determined by the Mill.</p> <p>FFB price is made publicly available and displayed in entering mill gate and regularly informed if the prices is changing. The FFB prices is applicable for non-certified sources, because Gunung Melayu 1 POM also receives FFB's from non-certified.</p>	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	<p>The unit of certification have no Scheme Smallholders program and supply base is from own estate (Pulau Maria Estate). The FFB's prices is determined by the Mill and depending on the company calculation.</p>	Not Applicable

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		This indicator is Not applicable	
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	<p>The unit of certification have no Scheme Smallholders program, therefore no specific agreement on this.</p> <p>However, the Mill are receives FFBs from indirectly sources like agents, collecting points and independent smallholders. The whole FFB suppliers have individual agreement/contracts whereby the terms of contracts are clearly details and agreed by suppliers. FFB's prices is determined by the Mill and depending on the company calculation.</p> <p>This indicator is Not Applicable</p>	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>Contracts from third party (supplier) are fair, legal and transparent and have an agreed timeframe.</p> <p>In example: external supplier undernamed PT Sawit Trading Sejahtera (No.: 001/TBS/GM/2020, 1 May 2020). The contract states several things:</p> <ul style="list-style-type: none"> - Term of the contract - FFB unit price - Terms of payment - Product quality/quality - Prohibition of originating from Protected Forest Areas, stolen proceeds and other criminal acts. <p>This agreement was agreed upon by company representatives and also the FFB supplier.</p> <ul style="list-style-type: none"> • An example of payment verified by the auditor is invoice and proof of payment for period for September 2023 where the calculation of 	Complied

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		payment is in accordance with the amount of FFB acceptance in Mill and the price set.	
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	<p>The company shows proof of recorded payment for FFB to external suppliers on behalf of :</p> <ul style="list-style-type: none"> - PT Sawit Trading Sejahtera in the recorded proof of payment for the period April 28 to May 1 2023. - Kebun Aman in the recorded proof of payment for the period 1 to 30 September 2023. - Win Win in the recorded proof of payment for the period 1 to 30 September 2023. <p>In the proof of payment, the FFB price refers to the FFB price determination mechanism determined by the company. In this pricing mechanism, the company considers the current prices of CPO and Kernel, processing operational services and also transportation services.</p>	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	<p>The company shows recordings of weigh calibrations at palm oil processing factory units, along with details of the results:</p> <ul style="list-style-type: none"> - Minutes of Handover of Brand/Type Avery E1205 Serial Number 142750249 Capacity 50,000 kg on 14 July 2023 by a technician with the result "The scales have been re-calibrated and stamped with the 2023 tera seal". <p>Minutes of Handover of Brand/Type PSC 7801 Serial Number PM220262, 50,000 kg capacity on 25 May 2023 by a technician with the result "The scales have been re-weighted and stamped with the 2023 stamp".</p>	Complied
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal	The company supports independent smallholders in the CSV (Create Share Value) program. The program was created in the context of coaching independent smallholders to develop their palm oil plantation management skills so that they can achieve optimal FFB production results	Complied

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	Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	<p>with good quality and meet standards, while still paying attention to aspects of sustainable and sustainable palm oil plantation management. The following are some of the Collaboration records shown:</p> <ul style="list-style-type: none"> - Partnership Cooperation Agreement between PT Gunung Melayu and the Berumbung Atas Makmur Farmers Group (No.81/CSV/GM/VII/2022, 3 July 2022). - Partnership Cooperation Agreement between PT Gunung Melayu and the Sejahtera Farmers Group (No.79/CSV/GM/VII/2022, 1 July 2022). - Partnership Cooperation Agreement between PT Gunung Melayu and the Jaya Tani Farmers Group (No.82/CSV/GM/VII/2022, 4 July 2022). <p>Partnership Cooperation Agreement between PT Gunung Melayu and the Sidomulyo Makmur Prosperous Farmers Group (No.80/CSV/GM/VII/2022, 2 July 2022).</p>	
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	The unit of certification have no Scheme Smallholders program, if grievances raises from external parties then following procedure is Standard Operating Procedure, No. SOP: XX-HR-308.5-RO; Revision: 0, December 11 th , 2009:	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	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.	There is no scheme smallholder at PT. Saudara Sejati Luhur- PT Gunung Melayu, however based on document review and interview with the Head of Administration, Sustainability Staff and Humas, PT. Saudara Sejati Luhur has started a relationship with an independent smallholders under Farmer Groups "Kelompok Tani" named Create Share of Value (CSV) program for around the company several years ago. The CSV program is aimed at fostering independent smallholders in improving their economy by providing sustainable guidance and receiving FFB to be processes at the company mill. There is 21 Farmer Group "Kelompok Tani", 780	Complied

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		<p>smallholders and 3,201 Ha of area that has been registered at the CSV Program PT Gunung Melayu – PT Saudara Sejati Luhur.</p> <p>The partnership agreement has been verified, verified samples such as:</p> <ul style="list-style-type: none"> - Partnership Agreement No. 03/MA/CSV/VIII/2014 dated 29 August 2014 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Makmur Abadi (Batu Anam Village), consist of 26 head of families with an area of 269 Ha. - Partnership Agreement No. 05/SSM/CSV/VIII/2017 dated 10 August 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Sejahtera Sidomulyo Makmur (Sidomulyo Village), consist of 40 head of families with an area of 100 Ha. - Partnership Agreement No. 10/MJ/CSV/VIII/2017 dated 24 August 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Mekar Jaya (Sidomulyo Village), consist of 30 head of families with an area of 43 Ha. - Partnership Agreement No. 08/SM/CSV/VIII/2017 dated 14 August 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Suka Maju (Sidomulyo Village), consist of 25 head of families with an area of 50 Ha. - Partnership Agreement No. 08/SM/CSV/VIII/2017 dated 14 August 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Berumbun Atas Makmur (Teladan Village), consist of 11 head of families with an area of 75 Ha. - Partnership Agreement No. 63/TS/CSV/VIII/2018 dated 28 August 2018 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Tani Sejahter (Batu Anam Village), consist of 17 head of families with an area of 37.5 Ha. - Partnership Agreement No. 39/JT/CSV/XI/2017 dated 30 November 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and 	
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		<p>Kelompok Tani Jaya Tani (Buntu Maraja Village), consist of 10 head of families with an area of 310 Ha.</p> <ul style="list-style-type: none"> - Partnership Agreement No. 16/BTJ/CSV/IX/2017 dated 13 September 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Berkat Tani Jaya (Gunung Berkat Village), consist of 38 head of families with an area of 552 Ha. <p>For support to improve their livelihoods and their interest in RSPO certification, the unit of certification supporting on agronomy assistances to the independent smallholders surrounding the plantations, such as awareness of harvesting technique, FFB quality, IPM and corporate policies related to RSPO requirement such as FFB legal traceability. The awareness conducted to Berumbun Atas Makmur Farmer Group on 23rd July 2023.</p> <p>-</p>	
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).	PT Saudara Sejati Luhur – PT Gunung Melayu has develop and implement livelihood improvement programmes of independent smallholders in surrounding communities with Create Share of Value (CSV) program as mentioned in the indicator 5.2.1. The CSV program is aimed at fostering independent smallholders in improving their economy by providing sustainable guidance and receiving FFB to be processes at the company mill. There is 21 Farmer Group " <i>Kelompok Tani</i> ", 780 smallholders and 3,201 Ha of area that has been registered at the CSV Program PT Gunung Melayu – PT Saudara Sejati Luhur.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	The company supports independent smallholders in the CSV (Create Share Value) program. The program was created in the context of coaching independent smallholders to develop their palm oil plantation management skills so that they can achieve optimal FFB production results with good quality and meet standards, while still paying attention to aspects of sustainable and sustainable palm oil plantation management. The following are some of the Collaboration records shown:	Complied

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		<ul style="list-style-type: none"> - Partnership Cooperation Agreement between PT Gunung Melayu and the Berumbung Atas Makmur Farmers Group (No.81/CSV/GM/VII/2022, 3 July 2022). - Partnership Cooperation Agreement between PT Gunung Melayu and the Sejahtera Farmers Group (No.79/CSV/GM/VII/2022, 1 July 2022). - Partnership Cooperation Agreement between PT Gunung Melayu and the Jaya Tani Farmers Group (No.82/CSV/GM/VII/2022, 4 July 2022). - Partnership Cooperation Agreement between PT Gunung Melayu and the Sidomulyo Makmur Prosperous Farmers Group (No.80/CSV/GM/VII/2022, 2 July 2022). <p>In this agreement, the company collaborates in developing independent farmers, including in terms of receiving and purchasing production results (fresh fruit bunches), including supporting TBS that comes from areas that have legal validity (not from production forest areas/areas and also conflict).</p>	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>Currently the company does not have a smallholder scheme within the scope of its operational area. However, it has a CSV (Create Share Value) program to support local farmers around the company to improve their welfare by cultivating oil palm. The company carries out training activities related to pesticides for several villages, for example:</p> <ul style="list-style-type: none"> - Recording of GAP (Good Agriculture Practice) Training in Gonting Malaha Village on March 4, 2023. - Recording of GAP (Good Agriculture Practice) Training in Gunung Berkas Village on July 15, 2023. 	Complied

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		- The training materials include the implementation of a pest census and its control.	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	The management unit has conducted periodic reviews and made public reporting on the development of support to farmers on a regular basis which is carried out annually for all units under Asian Agri Group. This can be seen in the CSV sustainability report which is available in all company units.	Complied
Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.			
Criteria 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Equal opportunity policy is stated in "Kebijakan Perusahaan", dated 1 st December 2014 "Company Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age. This policy has been informed to all employees and being placed into noticed board in public area and easily accessed. PT Saudara Sejati Luhur – Gunung Melayu I POM also has SOP about the new employment recruitment. According on SOP: AA-HR-305.2-R0 dated 1 February 2009 about "Penerimaan Karyawan Baru" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. The policy described the organization recognize and respect to the rights of local, migrant, or urban worker. Workers register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was	Complied

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		<p>identified based on religion, ethnic, gender. No evidence of discrimination found during the audit. Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>This employee list proves that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>According to the latest employee's data as per July 2021. Those workers come from different gender, religion, originated area (local or outsiders) and races. Based on interview with labour representative (labour union, gender committee) and random workers that interviewed during field visit obtained information that there is no discrimination between them.</p> <p>Since the audit – August 2021, there was no migrant worker hired in estate or mill.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has a SOP related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>Penerimaan Karyawan Baru</i>" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications.</p> <p>This procedure was communicated to all employees in the workplace and stakeholders.</p> <p>The procedure and its content already comply with applicable laws and regulation in Indonesia related workforce/employment.</p> <p>All procedure is available in Bahasa and has been communicated to all workers.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has conducted regular evaluation against all of employees, as one aspect considered for promotion and conducted talent test prior to promotion.</p>	Complied

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		<p>New recruitment for Mill during October 2022 to September 2023 is 9 persons:</p> <p>In example: Mr. Erik Wahyudi (Apply on 3 January 2023), recruited on 21 Jan 2023; Occupation: Operator Water Treatment Plant.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>There is no pregnancy testing perform by UoC, the pregnancy testing is applied by female worker itself. If there is any deviation of menstrual period then the female workers report to the clinic to have treatment.</p> <p>According to the treatment at the Clinic, no discrimination is apply. It is applicable for all female workers (permanent or contract), including the workers wife.</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>PT Saudara Sejati Luhur has formed a Gender Committee at Gunung Melayu 1 Mill and Pulau Maria Estate. Gender committees play a role in: addressing issues related to women's rights and counselling for women workers who experience acts of violence and sexual harassment and other issues related to women workers. In 2023 Gender Committee Work Program has been established including the issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> - Improving maternal and child health through Posyandu (integrated service post), immunization and vitamin supplement activities. - Conduct regular gender committee meetings at least every 4 months - Provision of supplementary food (during Posyandu) - Sports activities for employees - Environmental cleanliness in residential areas - Assessment of healthy housing for employees - Religious activity <p>The regular monthly gender committee meeting was held on 9 July 2023 which discussed the protection of the rights of women workers from the company, the meeting was attended by 4 representatives of women workers from each affair (a list of attendance can be shown at the time of the audit).</p> <p>Based on interview with sample of female workers and gender committee chairman, awareness related issues of concern and how to address is conducted</p>	Complied

		consistently. Such as: religion meeting in mosque, church or weekly meeting in compound.	
6.1.6	There is evidence of equal pay for the same work scope.	<p>Equal Opportunity policy is written in Bahasa Indonesia, so that all employees can understand as stated in "Kebijakan Perusahaan", dated 01st December 2014 "Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age.</p> <p>Based on the interview with the women workers (pesticide applicator and IPM census) obtain information there is no difference of the payments between the men or women workers. All are equal. Those information are aligned with the payroll document when the minimum wage are applied to all workers.</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	(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>PT Saudara Sejati Luhur has had company police regarding discrimination and equal opportunity for all employees and during audit that policy there were no changes i.e. "Kebijakan Perusahaan", dated 1st December 2014 "Company Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age.</p> <p>This policy has been informed to all employees and being placed into noticed board in public area and easily accessed and also socialization to all employees on 10 May 2023 in Pulau Maria Estate.</p> <p>In the process of recruiting workers, the company already has procedures i.e. SOP: AA-HR-305.2-R0 dated 1 February 2009 about "Penerimaan Karyawan Baru" (Recruitment and Selection of Employee), Unit of</p>	Complied

		<p>Certification will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. The policy described the organization recognize and respect to the rights of local, migrant, or urban worker.</p> <p>Workers register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit. Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>This employee list proves that Unit of Certification does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender.</p>	
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.	<p>The Collective Labor Agreement (PKB) and the daily labour contract of the wage was presented in Bahasa Indonesia.</p> <p>Collective Labour Agreement are contain the detail of working condition among others: responsibility each parties, recognition of company and trade union rights, work relationship, workers admission and requirement, job placement and transfer, working days and working hour, overtime, weekly rest and official holidays, annual leave, menstruation leave pregnancy and pregnancy loss, prevention of sexual harassment, permission to leave work of worship and permission of illness, wage component and wage system, wage increase, holiday allowance (THR), care and medication, occupational safety and health, work equipment, education, sports & entertainment facilities, school children's facilities, work rules, etc.</p>	Complied
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave,	The Collective Labor Agreement (PKB) document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of	Non-compliance

	<p>reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT SSL - Gunung Melayu Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement/Transfer/Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others.</p> <ul style="list-style-type: none"> - Based on interviews with several workers and labor unions, they do not understand the PHL/PKWT compensation in accordance with PP no. 35/2021 - Based on interviews with fertilizer workers at Afdl. 1 Pulau Maria Estate ((Sumarni, Bien Fitriani, Atika Anggraini dan Maya Dawantri) with PHL status who have worked >4 years, they stated that they did not understand the PKWT compensation and from 2021 they had never received PKWT compensation. - Perjanjian Kerja Untuk Jangka Waktu Tertentu document does not explain the provision of PHL/PKWT compensation at the end of the employment agreement period. In Article IV; Compensation only explains the worker's wages/salary and income tax, for example: <ol style="list-style-type: none"> 1) Perjanjian Kerja Harian No. 106/PKH/KPM/11/2023 dated 6 November 2023 in the name of Akhirudin Harahapboleh (Harvester) at Pulau Maria Estate. 2) Perjanjian Kerja Waktu Tertentu No. 003/PKWT/KPM/II/2023 dated 1 	
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		<p>February 2023 on behalf of Sudarto on position Harvester at Pulau Maria Estate</p> <p>3) Perjanjian Kerja Harian Lepas No. 005/PKHL/PGS/X/2023 dated 1 October 2022 on behalf of Jefry Lubis on position Autofeder operator helper, validity period is 3 months.</p> <p>Unit of certification did not comply with other legal labour requirements in contracted workers agreement (PHL/PKWT) as required by Government Regulation No. 35 of 2021 [Articles 15 and 16] effective from date 2 February 2021, related to compensation terms.</p> <p>This is Non-conformity.</p>																	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>During onsite visit to workers compound at Pulau Maria Estate and Gunung Melayu I POM, all workers facilities was provided by the company free.</p> <p>The following is a list of housing and facilities in Pulau Maria Estate:</p> <table><tr><th>NO</th><th>Facilities</th></tr><tr><td>1</td><td>Mosque</td></tr><tr><td>2</td><td>Churches</td></tr><tr><td>3</td><td>TPA (Tempat Penitipan Anak)-Child Care</td></tr><tr><td>4</td><td>Clinics</td></tr><tr><td>5</td><td>Preschools</td></tr><tr><td>6</td><td>Employee housing</td></tr><tr><td>7</td><td>Electriccity and clean water (Generator)</td></tr></table>	NO	Facilities	1	Mosque	2	Churches	3	TPA (Tempat Penitipan Anak)-Child Care	4	Clinics	5	Preschools	6	Employee housing	7	Electriccity and clean water (Generator)	Complied
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		In employees housing at Pulau Maria Estate, there are 5 unit houses just repair and re-build. It is clear that unit of certification is aware with employees welfare, particularly houses facilities.										
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	During interview with sample of workers at Pulau Maria Estate and Gunung Melayu I POM, they stated that company provide vehicle for shopping once a week, to buy affordable food. Because this Estates located far from traditional market or shopping area.	Complied									
6.2.6	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>PT Saudara Sejati Luhur – Gunung Melayu I POM has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/04/2020, dated 12 January 2020; regarding: "Kenaikan Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers).</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also demonstrated the slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Tenaga kerja and Kesehatan) and deduction.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has calculations the DLW, based on the wages given to employees as costs.</p> <p>Following is DLW Calculation:</p> <table><tr><th>No.</th><th>In Kind Benefits</th><th>Total</th></tr><tr><td>1.</td><td>Housing (Cost of Building: 30 years) + (Annual Maintenance: Number of Houses) ÷ 12 Months</td><td>474,984</td></tr><tr><td>2.</td><td>Electricity & Water (Annual cost of water & electricity ÷ Number of houses) ÷ 12 Months</td><td>171,361</td></tr></table>	No.	In Kind Benefits	Total	1.	Housing (Cost of Building: 30 years) + (Annual Maintenance: Number of Houses) ÷ 12 Months	474,984	2.	Electricity & Water (Annual cost of water & electricity ÷ Number of houses) ÷ 12 Months	171,361	Complied
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		3.	Education [(Total cost not including teacher and non teacher labour cost + school transport + school building maintenance + food for children) ÷ number of workers] ÷ 12 months	72,022	
		4.	Creche Facilities (TPA) (Building maintenance + Food for children + supplies + caretaker cost) ÷ Number of workers	17,761	
		5.	Healthcare (Kesehatan) (Maintenance of clinic, medicine & medical materials, ambulance transport cost + cost of healthcare workers) ÷ Number of workers	417	
		6.	Food	100,880	
		7.	Sport & Recreation Facilities	3,322	
		Total Cost of In Kind Benefits		840,747	
		Average Monthly Take Home Salary per Worker		3,028,497	
		Total Value of Prevailing Wage		3,869,244	

PROCEDURAL NOTE:

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.

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:

1. Payment of minimum wages in accordance with applicable regulations

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<p>2. Assessment of wages paid (prevailing wages) and in-kind benefits. 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>In this surveillance audit, verification was carried out on the use of workers (core work) for harvesters at Pulau Maria Estate - PT Saudara Sejati Luhur. as follows: <u>Pulau Maria Estate:</u> In 2023 has been promoted for harvester PHL (temporary worker) to SKU (Permanent worker) in 3 period:</p> <ul style="list-style-type: none"> - Period I; Based on Memorandum from HR Ops. Plantation I dated 27 February 2023 No. 244/HR-RO1/MEMO/2/2023 as much as 9 Harvester. - Period II; Based on Memorandum from HR Ops. Plantation I dated 30 June 2023 No. 321/HR-RO1/MEMO/6/2023 as much as 16 Harvester. - For Period III; PHL harvester promotion has been submitted to HR Ops. Plantation 1 on 23 November 2023 has 35 harvesters, although there has been no approval <p>Based on employee master on November 2023, there are no Harvesters with PHL status.</p> <p>Auditor also taking sample interview of casual workers or "Pekerja Harian Lepas" for Upkeep. The working days for casual/daily labour is only 20 days a month and not continually.</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>			

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6.3.1	(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.	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. Statement recognizing freedom of association and right to collective bargaining policy is written in Bahasa Indonesia, as stated in "Kebijakan Perusahaan", dated 1 st December 2014 <i>"Menghormati hak setiap karyawan untuk membentuk atau menjadi serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif"</i> . This policy has been informed to all employees and being placed into public area easily accessed.	Complied
6.3.2	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.	Labour union is available at unit of certification. Structure of labour union is comprises of workers (Estate and Mill), such as supervisor (mandor). While representative of the management is Estate/Mill Manager or Assistant which appointed during the meeting. Labour Union has regularly meet with representative of management. Minutes of meeting we available at list of attendance was sighted. The minutes were made readily available to employees upon request, e.g: Minute of Meeting dated 27 August 2023, to discuss: <ul style="list-style-type: none"> - PPE replacement is proposed for 2 times a year (mill) - Day Off implementation 	Complied
6.3.3	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.	Based on interview with sample of employees at Mill and Pulau Maria Estate, in this 1.2 surveillance audit informed that management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers operation of registered labour organizations/unions, or other freely elected representatives for all workers.	Complied
Criteria 6.4: Children are not employed or exploited.			

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6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	PT Saudara Sejati Luhur – Gunung Melayu I POM established the Policy, was signed by Managing Director dated 1 st December 2014, that stated: "It is not allowed all children to work in every activities/process in company". Based on document review of list of workers, interview with workers and observation during field visit, it was no found workers hired less than 18 years. Sample seen: The youngest workers namely M. Harto Satria (Birth date 26-10-1996; Join date 5-3-2016) and Mr Deni Atmajaya (Birth date 18-12-1998; Join date 1-7-2017).	Complied
6.4.2	(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.	PT Saudara Sejati Luhur – Gunung Melayu I POM established the Policy, was signed by Managing Director dated 1 st December 2014, that stated: "It is not allowed all children to work in every activities/process in company". Based on document review of list of workers, interview with workers and observation during field visit, it was no found workers hired less than 18 years. Sample seen: The youngest workers namely M. Harto Satria (Birth date 26-10-1996; Join date 5-3-2016) and Mr Deni Atmajaya (Birth date 18-12-1998; Join date 1-7-2017).	Complied
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	Based on interview with chairman of labour union obtained information that the minimum age of workers has been socialized to the respective workers in all level. According to the list of workers period June 2021, there is no underage employee found. Based on interview with worker and document verification, there is no indication on forced labour and/or trafficked labour.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and	PT Saudara Sejati Luhur – Gunung Melayu I POM established the Policy, was signed by Managing Director dated 1 st December 2014, that stated:	Complied

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	promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>"It is not allowed all children to work in every activities/process in company".</p> <p>Based on document review of list of workers, interview with workers and observation during field visit, it was no found workers hired less than 18 years.</p>	
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has implemented policy on prevention of sexual harassment and violence, the policy is prominently displayed on notice boards at the Mill and Estates muster areas.</p> <p>Based on interviews of female workers and union representatives confirmed that the company implemented the sexual harassment policy. (which is the latest circular letter to complement previous circulars).</p> <p>The policy has disseminated to all employees.</p>	Complied
6.5.2	(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>A gender committee was available in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has established the company policy dated 1st December 2015 related to A policy to protect the reproductive rights of all, especially of women. The policy stated that "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights".</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Based on interview with Gender Committee, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly</p>	Complied

		prohibit pregnant and/or breastfeeding female worker applying pesticides. The latest pregnancy test in July 2021	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.	<p>The unit of certification has implemented policy to give special time to female workers who are breastfeeding their children. According to the circular letter from the Group Manager on 7 March 2020, all the new mother has given permission to one hour-breastfeeding time in daycare or clinic within their working hour (refer to the meeting agreement between unit management with gender committee and labor union). All the new mother has been acknowledge this policy on 5 May 2020.</p> <p>Based on interview with female worker from fertilizer application and spraying gang, states there is monthly check and monitoring on pregnancy and breastfeeding status. Until this audit, there was 7 new mother existed.</p>	Complied
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.	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared Protection of Whistleblower Mechanism or “Mekanisme Jaminan Pelapor dan Pengungkapan Kasus” prepared by Public Relation officer PT. Gunung Melayu on 01/12/2015. The mechanism has explained policy to protect complainant/whistle blower anonymity – if requested.</p> <p>Mechanism of Grievances Mechanism or “Mekanisme Penanganan Keluhan” – complaint handling mechanism (No. SOP-AA-GL-5005- R0 01) is documented procedure to response complaint from external party. For internal, the mechanism described under “Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan” – Employee’ complaint and resolution mechanism (No. SOP-AAHR-3008- R0 05).</p> <p>These mechanisms have been communicated to external parties and disseminated to all employees.</p> <p>Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.</p>	Complied

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Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages 	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has had employee recruitment and selection procedures (SOP-AA-HR-305-2-RO) effective since 1 February 2009. Based on those procedure, there is no specific request to bonding the employee (especially the new employee).</p> <p>Based on interview with workers and workers union, stated that the unit of certification does not practiced such thing as follows:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 	Complied
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>Based on Memorandum document verification from HR Dept. in Head Office in the 2023 period, there are several PHL/PKWT – Specific Time Working Agreement workers who have been promoted to become SKUH (permanent workers), please see 6.2.7 above.</p> <p>Specific Time Working Agreement is regulated within Collaborative Agreement or Perjanjian Kerja Bersama.</p> <p>There is no migrant workers at unit of certification.</p>	Complied
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			

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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>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared the Standard Operating Procedure on personal protective equipment No. AA-SOP-OP-101.3-R0 dated 14/08/2013.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has registered OHS Committee as presented in document of "Surat Keputusan Kepala Dinas Tenaga Kerja Provinsi Sumatera Uatra UP Pengawasan Ketenagakerjaan Wilayan IV Nomor KEP.108/P2K3/DTK/V/2022 tentang Pengesahaan Panitia Pembina Pembina Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan dated 13th May 2022.</p> <p>Concerns of all parties about health, safety and welfare are discussed at P2K3 meetings which is conducted monthly. Sample seen on P2K3 meeting period Q3 dated 27/07/2023, 26/09/2023, and 25 August 2023. Any issues raised during meeting are recorded in Minutes of P2K3 meetings. Record of meeting also attached in the report of P2K3 Q3 year 2023 and submitted to Manpower office of Asahan Regency dated 16/10 2023. Receipt of P2K3 meeting report available in "Daftar Distribusi Eksternal".</p> <p>OHS training has been programmed and provided appear balanced with OHS hazard and risk at Mill and Estates. Basic OHS training performed internally by safety officer in charge at mill and estate, the training record and program related to OHS were sighted and verified during this audit, e.g.: licenses for boiler operator, operator of generator set, heavy equipment operator, pesticide training for sprayers</p>	Complied
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</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared the procedure for emergency response under Standard Operational Procedure – Environmental Field Procedure, such as:</p>	Complied

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	aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	<ul style="list-style-type: none"> – Nomor AA-KL-11-EFP tentang Penanganan Tumpahan di Laboratorium (Spill Handling in the Laboratory) – Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan (Land Fire Control) – Nomor AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3 (Control of Hazardous Material Spills and Waste) – Nomor AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya (Boiler Explosion Control, Gas Cylinders) – Nomor AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor (Control of Earthquakes, Floods and Landslides) – Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap (Haze Emergency Response) <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also prepared the procedure on work accident under "Standard Operasioanl Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0", revision 0 dated 1st April 2018.</p> <p>Those procedures have socialized and available in notice board in site, during interviewed with workers, it was seen that they understood. Emergency call phone also is available in all site operation.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has assigned the first aider namely Retno Satika license No. 17/P3K/2016.</p>	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine 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>During the onsite audit, the auditor team notes that the workers in mill and estate has used appropriate PPE refer to the HIRADC in each station. All the PPE distributed are for free. Sample seen:</p> <ul style="list-style-type: none"> • Loading ramp operator provide with safety boot, hand glove and mask. 	Complied

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		<ul style="list-style-type: none"> • Sterilizer station operator provide with safety shoes, hand gloves, mask, safety glasses and ear plug. • Boiler operators provide with ear plug, mask, hand gloves, safety shoes and safety glasses. • Engine room operator provide with safety shoes, hand gloves, earmuff and mask. • Welder provides with safety shoes, hand gloves, apron, and safety goggles dedicated for welder. • Harvester in estate provide with helm, safety goggles and safety boots. Along with their harvesting equipment is chisel cover to avoid the accident during moving to another harvesting plot. • Chemical weeding applicator provide with safety boots, mask, hand gloves, safety goggles and apron. They also provided with dedicated uniform for chemical weeding applicator. <p>Unit of Certification is provided appropriate personal protective equipment (PPE) free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Evidence of PPE provision and handover to workers can be shown during audit in "<i>Tanda Terima APD</i>". During field visit and interview to Gunung melayu 1 POM and Pulau Maria Estate it was sighted that all workers has use appropriate PPE during working and they explained that PPE is provided free of charge, when the PPE is broken because of the working usage workers can request to change for the new PPE.</p> <p>PPE usage monitoring conducted with General mill inspection "Form AA-SOP-HSE-10B" and General Estate inspection "Form AA-SOP-HSE-10A" which is conducted monthly. Sample seen for General Mill Inspection dated 28/10/2023, General Estate inspection Pulau Maria Estate dated 26/10/2023.</p>	
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		Unit of certification also provide rinse and wash station namely 'rumah bilas' for chemical applicator (weeding and manuring). As explained by the chemical applicators team and manuring team during field visit, auditor team noted that all chemical workers shall change their clothes with the uniform in 'rumah bilas' before started to work. And after work, all of them, including field supervisor shall back to the 'rumah bilas' to take a shower, changing their clothes and washing their PPE and uniform before back home. Meaning that all workers must be cleaned when they back home to minimize the residual risk of pesticide.	
6.7.4	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.	PT Saudara Sejati Luhur – Gunung Melayu I POM has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment and working tools. PT Saudara Sejati Luhur – Gunung Melayu I POM has provided regular medical check-up for workers in high risk such as sprayer team, fertilizer applicator, workshop worker and mill operators.	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Unit of certification EHS team prepares safety index. The safety index is monitoring tool, indicating number of worker (at each operating units), number of major and minor accident as well as the lost time injury. The monitoring carried out on monthly basis and results were discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly as P2K3 report by safety officer to Manpower office, sample seen: Report of P2K3 period Jan – Jun 2023. Unit of certification has shown the record of injuries using lost time accident (LTA) metrics as in "Rekapitulasi Kejadian Kecelakaan Kerja PT Saudara Sejati Luhur – LTA" 2023 ytd October 2023. According to accident	Complied

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		<p>report and LTA Metric it was noted that there is no accident in Gunung Melayu 1 POM since January – October 2023; in Pulau Maria Estate there were 15 case of accident (consist of 7 cases of minor injuries and 8 cases of first aid) with Lost Time Injuries 18 hours.</p> <p>All the accidents have followed up with investigation record and recommendation. The investigation has completed with accident insurance claims records.</p>	
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<p>The company has a program for integrated pest control. In this program, the company carries out initial identification of the existence of beneficial plants as an initial step in control. If during the detection process a pest attack is found, the company will carry out a census of pest attacks. Control using chemicals is only carried out if the pest attack has crossed the threshold.</p> <p>The auditor also carried out field observations, it was discovered that the company had installed barn owl box as a form of biological control for rat attacks.</p> <p>The following are several monitoring records of census attacks and biological control for several units, including:</p> <ul style="list-style-type: none"> - Recapitulation of the results of the Leaf-Eating Pest Census for the October 2023 Period in Pulau Maria Estate, it is known that there were no pest attacks. - Counting record of rat and tirathaba attacks for the October 2023 period at Pulau Maria Estate revealed that there were no rat and tirathaba attacks. 	Complied

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		The results of the Ganoderma attack census in Pulau Maria Estate for the October 2023 period showed total 863 infected tress. Currently the company has not carried out the main demolition, the company's consideration of the demolition will also be carried out during replanting activities based on economic considerations.																
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	The company does not plant or maintain useful plants that include into the invasive category in accordance with Minister of Environment Regulation No. 96/2016 about Invasive Types.	Complied															
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on the results of document reviews and also field observations in Pulau Maria Estate, it is known that there was no use of fire in controlling pest. This is in line with the results of public consultation with the District Agriculture Service of Asahan Regency, that the local community did not find or see the company using fire to control pests.	Complied															
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																		
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	<div>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:</div> <table><tr><td>Name</td><td>Active Ingredients</td><td>Justification</td></tr><tr><td>Kenlon 480 EC</td><td>Trychlopyr: 480 gr/ltr</td><td>Herbicide</td></tr><tr><td>Kenrane 288 EC</td><td>trifluroksipir-1 Metil heptil ester: 288 gr/ltr</td><td>Herbicide</td></tr><tr><td>Solusi</td><td>Amonium Glufosiat</td><td>Herbicide</td></tr><tr><td>Glufo</td><td>Amonium Glufosiat</td><td>Herbicide</td></tr></table>	Name	Active Ingredients	Justification	Kenlon 480 EC	Trychlopyr: 480 gr/ltr	Herbicide	Kenrane 288 EC	trifluroksipir-1 Metil heptil ester: 288 gr/ltr	Herbicide	Solusi	Amonium Glufosiat	Herbicide	Glufo	Amonium Glufosiat	Herbicide	Complied
Name	Active Ingredients	Justification																
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		<table><tr><td>Gulmaron 80 WP</td><td>Diuron</td><td>Herbicide</td></tr><tr><td>Supremo</td><td>Isopropil Amina Glifosat</td><td>Herbicide</td></tr></table> <p>The results of field observation on Pulau Maria 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.</p>	Gulmaron 80 WP	Diuron	Herbicide	Supremo	Isopropil Amina Glifosat	Herbicide															
Gulmaron 80 WP	Diuron	Herbicide																					
Supremo	Isopropil Amina Glifosat	Herbicide																					
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>The company has records related to pesticide use in the document "Quantity of Hazardous Chemical Period 2023". 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 several sample units:</p> <p>Pulau Maria Estate</p> <table><tr><th>Name</th><th>Total Application</th><th>Total Active Ingredient</th><th>Total Area Application</th></tr><tr><td>Supremo 480 SL</td><td>785.30</td><td>216.74</td><td>499.56 ha</td></tr><tr><td>Gulmaron 80 WP</td><td>203.67</td><td>56.21</td><td>226.10 ha</td></tr><tr><td>Basis 150 SL</td><td>1,060.30</td><td>292.64</td><td>155.79 ha</td></tr><tr><td>Metaprima 20 WG</td><td>142,762</td><td>39,402</td><td>364.86 ha</td></tr></table>	Name	Total Application	Total Active Ingredient	Total Area Application	Supremo 480 SL	785.30	216.74	499.56 ha	Gulmaron 80 WP	203.67	56.21	226.10 ha	Basis 150 SL	1,060.30	292.64	155.79 ha	Metaprima 20 WG	142,762	39,402	364.86 ha	Complied
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Metaprima 20 WG	142,762	39,402	364.86 ha																				

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		The document kept at the 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.										
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	<p>The company shows evidence of a reduction in pesticide use for estate each year. Here are some examples:</p> <p>Pulau Maria Estate</p> <table><tr><td>Pestiside Name</td><td>2022 (ltr)</td><td>2023 (ltr)</td></tr><tr><td>Metaprima 20 WG</td><td>200,250</td><td>142,762</td></tr><tr><td>Biolon 670 EC</td><td>372.30</td><td>192.20</td></tr></table> <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>	Pestiside Name	2022 (ltr)	2023 (ltr)	Metaprima 20 WG	200,250	142,762	Biolon 670 EC	372.30	192.20	Complied
Pestiside Name	2022 (ltr)	2023 (ltr)										
Metaprima 20 WG	200,250	142,762										
Biolon 670 EC	372.30	192.20										
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	<p>In the context of integrated pest control, the company has related procedures in:</p> <ul style="list-style-type: none">- SOP Weed Control (AA-APM-OP-1100.08-R6)- SOP Pest and Disease Control (AA-APM-OP-1100.10-R8)- SOP for Pesticides and Their Management (AA-APM-OP-1100.11-R1) <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.</p> <p>The due diligence refers to:</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>Biolon 670 EC</td><td>Trychlopyr: 480 gr/ltr</td><td>II</td></tr><tr><td>Kenrane 288 EC</td><td>trifluroksipir-1 Metil heptil ester: 288 gr/ltr</td><td>Pesticides unlikely to present hazard in normal use</td></tr><tr><td>Solusi</td><td>Amonium Glufosiat</td><td>II</td></tr><tr><td>Basis 150</td><td>Amonium Glufosiat</td><td>II</td></tr><tr><td>Gulmaron 80 WP</td><td>Diuron</td><td>III</td></tr><tr><td>Supremo</td><td>Isopropil Amina Glifosat</td><td>III</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	Biolon 670 EC	Trychlopyr: 480 gr/ltr	II	Kenrane 288 EC	trifluroksipir-1 Metil heptil ester: 288 gr/ltr	Pesticides unlikely to present hazard in normal use	Solusi	Amonium Glufosiat	II	Basis 150	Amonium Glufosiat	II	Gulmaron 80 WP	Diuron	III	Supremo	Isopropil Amina Glifosat	III	Complied
Name	Active Ingredients	Class																						
Biolon 670 EC	Trychlopyr: 480 gr/ltr	II																						
Kenrane 288 EC	trifluroksipir-1 Metil heptil ester: 288 gr/ltr	Pesticides unlikely to present hazard in normal use																						
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Basis 150	Amonium Glufosiat	II																						
Gulmaron 80 WP	Diuron	III																						
Supremo	Isopropil Amina Glifosat	III																						
	7.2.5b Why there is no other alternative which can be used.	As explained in 7.2.5, there's no use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat																						

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	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	As explained in 7.2.5, there's no use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat	
	7.2.5d Process to limit the negative impacts of the application.	<ul style="list-style-type: none"> As explained in 7.2.5, there's no use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat 	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	As explained in 7.2.5, there's no use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	Based on the results of interviews with the spraying team at Pulau Maria estate, it is clearly that sprayer team have trained and responsible to apply pesticides.	Complied
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices.	<p>The company has procedures related to pesticide management in the Pesticides and Management SOP (AA-APM-OP-1100.11-R1). The procedure informs the following things:</p> <ul style="list-style-type: none"> - Classification of pesticides based on target, chemical properties and mode of action. - Safety instructions for using pesticides. - Pregnant and breastfeeding women are prohibited from applying pesticides. - Empty pesticide packaging must be returned to the warehouse and then sent to hazardous waste temporary storage. - Pesticides must be stored in a special place and separately according to their respective groups. - First aid for pesticide poisoning 	Complied

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		<p>- Occupational safety and health equipment.</p> <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.</p>	
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.	From the results of field visit in housing area at Pulau Maria Estate, it was found that there were no traces of chemical packaging used as water reservoirs or other housing activities. From the results of documents review, in the form of waste manifests and Hazardous Waste Processing Data for washing logbook and management purposes, it is used as a water container for spray activities. Based on interviews with employees and the foreman of pesticide application Muara Wahau Estate, it is known that all pesticide packaging is collected at the designated storage area and the company coordinates with collectors to recycle and not be used for purposes other than pesticide application activities.	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.	Based on the results of document reviews and also field observations in Pulau Maria Estate it is known that no aerial pesticide control was found. This is in line with the results of public consultation with the District Agriculture Service of Asahan Regency that the local community did not find or see the company applying air spraying.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	The certification unit regularly have a medical examination for manuring and pesticide operator. Pulau Maria Estate has a list of the latest pesticide operator as many as 58 workers. All manuring and pesticide operator has examined health through inspection types of medical checkup and cholinesterase, to ascertain the condition of workers in good health.	Complied

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		<p>The medical surveillance resulted that all pesticides operators are health and no exposure from chemical.</p> <p>Auditors conduct interviews with spraying workers in Pulau Maria Estate and they admit that they have not been exposed to skin disease and itches because they always use PPE while working.</p>	
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.	Based on field observation and interview with pesticide operator in Pulau Maria Estate, known that there was no worker age under 18 years old that worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. The monitoring conducted through monthly pregnancy test. If founded expectant mother, she will be transferred to light nonchemical activity.	Complied
<p>Note For 7.2.11</p> <p>Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p>			
<p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	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>Based on the results of document verification and interviews with Company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. A documented waste management plan to avoid or reduce pollution and its implementation shall available under document of Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2020. The document covered all operation in mill, estate PT Saudara Sejati Luhur – Gunung Melayu I POM and Pulau Maria Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared a procedure to handle waste:</p>	Complied

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		<ul style="list-style-type: none"> - For hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP dated 22 April 2016 explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter. The temporary hazardous waste storage has permit according to "Keputusan Bupati Asahan Nomor 503/LB3/DMPPTSP/1427/XI/2017 tanggal 22 November 2017 tentang Pemberian Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT Saudara Sejati Luhur", permit valid for 5 years and PT Saudara Sejati Luhur has permit to store the hazardous waste for 180 days because of producing hazardous waste less than 50 kg/day. At this point, as per stakeholder consultation, company is in process "Rincian Teknis" technical specification document to meet latest regulation. - Procedure for non hazardous waste "SOP Penanganan Sampah Industri Non B3 Dokumen No.AA-KL-05-EFP" dated 1 February 2008. - Procedure for medical waste "SOP Penanganan Limbah Medis Dokumen No. AA-KL-07-EFP" dated 5 April 2017. The procedure stated medical waste treated as hazardous waste. <p>Procedure for laboratory waste "SOP Penanganan Limbah Laboratorium Dokumen No.AA-KL-11-EFP" dated 15 November 2008. The procedure stated waste from mill laboratory treated as hazardous waste.</p>	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>Company carried out waste management following the procedures.</p> <ul style="list-style-type: none"> - Fibre and kernel shell used as boiler fuel. - POME used in the land application as organic fertilizer. - Hazardous waste has been stored in licensed storage and disposed of using licensed transporter. PT. Saudara Sejati Luhur is using licensed transporter PT. Hazmat Techno Indonesia, permit for transporting hazardous waste "Izin Pengangkutan No.SK.00107/AJ.309/1/DJPD/2018". 	Complied

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		<p>Record of hazardous waste disposal, in form of manifest:</p> <ul style="list-style-type: none">- Manifest for electronic waste; Volume: 0.042 Ton, No. KLHK-1695315929; transporter PT Hazmat Techno Indonesia on 07 July 2023.- Manifest for used lamp waste; Volume: 0.015 Ton, No. KLHK-1695315853; transporter PT Hazmat Techno Indonesia on 07 July 2023.- Manifest for used oil waste; Volume: 0.04 Ton, No. KLHK-1695288425; transporter PT Hazmat Techno Indonesia on 07 July 2023.- Manifest for used rags waste; Volume: 0.039 Ton, No. KLHK-1697437828; transporter PT Hazmat Techno Indonesia on 07 July 2023.- Manifest for used chemical container waste; Volume: 0.042 Ton, No. KLHK-1695116771; transporter PT Hazmat Techno Indonesia on 07 July 2023. <p>The company has shown evidence of sending liquid waste and solid waste reports to the Asahan Regency Environment and Forestry Service on a quarterly basis, the last reporting was done on 8 November 2023.</p> <p>The company has shown evidence of sending hazardous waste reports for POM and Estate to the Asahan Regency Environment and Forestry Service on a quarterly basis, the last reporting was done on 8 November 2023.</p> <p>In addition, to manage domestic waste from employee housing, the company has managed by providing waste bins in the housing and providing waste pickers from the housing to the final landfill in a location far from the housing. Pelaporan limbah B3 for April -June 2023 on 7 August 2023.</p>	
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7.3.3	The unit of certification does not use open fire for waste disposal.	Based on the results of field visits to the Plantation housing and at other operational locations that were sampled, no traces of open or closed burning of waste were found, besides that the hazardous waste produced has been collected in the temporary storage of hazardous waste from the plantation and mill and then handed over to the third party hazardous waste transporters and collectors who have a permit, namely PT Hazmat Techno Indonesia.	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>To practice the best management of oil palm plants, the company has procedure and guidelines which are contained in the following procedures:</p> <ul style="list-style-type: none"> - AA-APM-OP-1100.01.R5 <i>Pembibitan (Nursery)</i> - AA-APM-OP-1100.02.R3 <i>Persiapan Lahan (Land Preparation)</i> - AA-APM-OP-1100.03.R2 <i>Pembuatan dan Perawatan Jalan dan Jembatan (Road Construction and Maintenance)</i> - AA-APM-OP-1100.04.R3 <i>Pembuatan dan Pemeliharaan Parit (Trench Construction and Maintenance)</i> - AA-APM-OP-1100.05.R3 <i>Konservasi Tanah Air (Water and Soil Conservation)</i> - AA-APM-OP-1100.06.R5 <i>Menanam Kacangan (Legume Cover Crops Planting)</i> - AA-APM-OP-1100.07.R6 <i>Menanam Kelapa Sawit (Oil Palm Planting)</i> - AA-APM-OP-1100.08.R6 <i>Pengendalian gulma (Weeding Control)</i> - AA-APM-OP-1100.09.R8 <i>Pemupukan (Manuring)</i> - AA-APM-OP-1100.10.R10 <i>Pengendalian HPT (IPM Control)</i> 	Complied

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		<ul style="list-style-type: none"> - AA-APM-OP-1100.11.R1 <i>Pestisida dan Pengelolaannya (Pesticides Management)</i> - AA-APM-OP-1100.12.R4 <i>Kastrasi (Palm Castration)</i> - AA-APM-OP-1100.13.R3 <i>Tunas Pokok (Pruning)</i> - AA-APM-OP-1100.14.R3 <i>Sensus dan Identifikasi Pokok (Palm Cesus)</i> - AA-APM-OP-1100.15.R2 <i>Sensus Produksi (FFB Census)</i> - AA-APM-OP-1100.16.R1 <i>Konsolidasi Pokok Tumbang (Palm Consolidation)</i> - AA-APM-OP-1100.17.R1 <i>Pengelolaan Air (Water Management)</i> - AA-APM-OP-1100.18.R3 <i>Potong Buah (Harvesting)</i> - AA-APM-OP-1100.19.R1 <i>Pengelolaan Transport (Transport Management)</i> - AA-APM-OP-1100.20.R8 <i>Peremajaan (Replanting)</i> - AA-APM-OP-1100.21.R2 <i>Riparian</i> - AA-APM-OP-1100.22.R0 <i>Pengelolaan Areal Nilai Konservasi Tinggi (NKT). – HCV Management</i> <p>The scope of fertilizing activities in the SOP covers all activities related to fertilizing oil palms in nurseries, Immature Producing Plants and Producing Plants both inorganic fertilizing and by oil palm products based on the results of soil and leaf analysis.</p>	
7.4.2	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.	The company carries out leaf analysis activities in the context of planning follow-up plant maintenance, including recommendations for fertilizer to	Complied

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		<p>be used for each land block. For example, the company carried out a leaf analysis examination for Pulau Maria Estate:</p> <ul style="list-style-type: none"> - Records of leaf testing at Pulau Maria Estate carried out on 3 April 2023 by PT Nusa Pusaka Kencana Analytical & QC Laboratory with Ref. Order 31/LSU-AGR/04/2023 with a total of 20 leaf samples . For example, in the leaf sample for block I02b, the test results showed a Ash 11.52%; N 2.29%; P 0.146%; K 0.86%; Mg 0.26%. - Records of leaf testing at Pulau Maria Estate carried out on 3 April 2023 by PT Nusa Pusaka Kencana Analytical & QC Laboratory with Ref. Order 34/LSU-AGR/04/2023 with a total of 16 leaf samples . For example, in the leaf sample for block J02a, the test results showed a Ash 12.21%; N 2.35%; P 0.152%; K 0.68%; Mg 0.25%. <p>In addition, there are also soil analysis records for each company unit, for example Records of soil testing at Pulau Maria Estate carried out on 10 November 2018 by Research and Development Asian Agri Group in the 3-sample location. Here's the detail:</p> <ul style="list-style-type: none"> - Sample No. 01 Block Profil P1 KPM with depth 0-13 cm with: N 0.24%; C 1.87%; Ca 1.70%; Mg 1.04%; K 0.47%. - Sample No. 06 Block Profil P2 KPM with depth 0-9 cm with: N 0.05%; C 0.50%; Ca 1.06%; Mg 0.33%; K 0.36%. 	
7.4.3	A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	The company has procedures and policies regarding the use of organic fertilizer in Procedure AA-APM-OP-1100.09.R8. This procedure explains the technicalities related to organic fertilization such as the application of EFB, Ash, Solid Decanter, compost, and Palm Oil Effluent. This procedure contains application techniques starting from dosage, application method, occupational health and safety equipment and recording.	Complied

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		<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">- Record of Actual EFB utilization (todate October 2023) on Pulau Maria Estate Block I02f as amount as 448 MT with recommendation is 468 MT.- Record of Actual EFB utilization (todate October 2023) on Pulau Maria Estate Block I06d as amount as 475 MT with recommendation is 486 MT.																
7.4.4	Records of fertilizer inputs are maintained.	<p>The company has records of fertilizer use in the 2023 Fertilizer Recommendations document. Below are some samples of fertilizer use records for several units:</p> <p>Todate October 2023</p> <table><tr><th>Division</th><th>Type</th><th>Amount (kg)</th></tr><tr><td>I</td><td>MOP</td><td>67,678</td></tr><tr><td>I</td><td>UREA</td><td>81,826</td></tr><tr><td>II</td><td>MOP</td><td>85,164</td></tr><tr><td>III</td><td>RP</td><td>135,361</td></tr></table> <p>Based on the review of fertilization realization documents, it was concluded that the fertilization realization was appropriate based on the fertilizer recommendations set.</p>	Division	Type	Amount (kg)	I	MOP	67,678	I	UREA	81,826	II	MOP	85,164	III	RP	135,361	Complied
Division	Type	Amount (kg)																
I	MOP	67,678																
I	UREA	81,826																
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III	RP	135,361																

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		<p>Based on document review and interviews with staff, the realization of fertilization in each estates reached 100% in 2022, it was completed according to the program.</p> <p>Based on the results of field observations of fertilization at Pulau Maria Estate, it is known that workers have implemented fertilization activities in accordance with company procedures.</p>							
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.	<p>There are no changes related to the suitability map and land types in the company's operational area. Apart from that, there is no addition/expansion of land from the previous assessment. In general, the types of land displayed on a land map with a scale of 1:30,000 are as follows:</p> <table><tr><th>Soil Classification</th><th>Description</th></tr><tr><td>Typic Hapludults</td><td>The texture of the clay is sandy - clay, the color of the soil is yellowish brown - dark brown, the structure of angular lumps, sticky and plastic, spreads over most areas with flat - hilly topography, good drainage.</td></tr><tr><td>Typic Endoaquepts</td><td>Sandy texture - clayey clay, soil color dark yellowish brown to gray, granular structure - rounded lumps, not sticky and not plastic, spread in some areas</td></tr></table>	Soil Classification	Description	Typic Hapludults	The texture of the clay is sandy - clay, the color of the soil is yellowish brown - dark brown, the structure of angular lumps, sticky and plastic, spreads over most areas with flat - hilly topography, good drainage.	Typic Endoaquepts	Sandy texture - clayey clay, soil color dark yellowish brown to gray, granular structure - rounded lumps, not sticky and not plastic, spread in some areas	Complied
Soil Classification	Description								
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			with flat topography, poor drainage.	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	From the results of field observations at the Pulau Maria Estate, it is known that replanting activities are not carried out with slopes above $\geq 25^\circ$ as stipulated in Minister of Agriculture Regulation No. 131 of 2013 concerning Guidelines for Good Palm Oil Cultivation.		Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	Based on the results of field observations, currently there are no new planting activities at Pulau Maria Estate.		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.	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005. Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.		Complied
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.		Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.		Complied

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Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.						
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	<div>Based on field observation and review document of Soil Survey Semi Detail on 2012 by Research & Development Asian Agri, here's the detail of soil classification on Pulau Maria Estate:</div> <div><table><tr><td>Soil Classification</td></tr><tr><td>Typic Hapludults</td></tr><tr><td>Typic Endoquepts</td></tr></table></div> <div>Based on that document there's no land classified as peat land in the company's operational area.</div>	Soil Classification	Typic Hapludults	Typic Endoquepts	Complied
Soil Classification						
Typic Hapludults						
Typic Endoquepts						
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area..	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.	Based on soil map and analysis, there is no peat soil in PT Saudara Sejati Luhur – Pulau Maria Estate. The map indicated the predominant soil type consist of Typic Hapludults and Typic Endoaquepts. This indicator is not applicable.	Not Applicable			
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	Based on soil map and analysis, there is no peat soil in PT Saudara Sejati Luhur – Pulau Maria Estate. The map indicated the predominant soil type consist of Typic Hapludults and Typic Endoaquepts. This indicator is not applicable.	Not Applicable			
7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area. This indicator is not applicable.	Not Applicable			

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	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.		
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).	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area. This indicator is not applicable.	Not Applicable
7.7.7	(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non- corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area. This indicator is not applicable.	Not Applicable
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			

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7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <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>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared the document on protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones as in document “Praktek-praktek Mempertahankan Kualitas dan Ketersediaan Air Permukaan dan Air Tanah” – Water Sustainable”.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also developed a procedure to maintain soil fertility and water quality as stated in SOP for maintaining riparian zone is under SOP AA-APM-OP-1100.05. R1 “Konservasi Tanah dan Air”, it is stated that at during land clearing area along the river shall be conserved.</p> <p>PT Saudara Sejati Luhur has implement the construction of terrace contour for hilly area, individual platforms, and drainage network to handle rainfall. Audit team has verified document on planting the riparian “Penanaman Sempadan” and visit to block J08f, Division II, buffer to Karmila river and found company has planted enrichment species such as: <i>Terminalia catappa</i>, <i>Vetiver grass</i>, <i>Paraserianthes spp</i>, <i>Bambusa spp</i>. along the riparian.</p> <p>Company also conducts water quality test on each semester. Water quality test performed by accredited laboratory PT. Atom Labolatorium Indonesia, analysis report verified.</p> <p>PT Saudara Sejati Luhur did not limit the supply of clean water to the worker. Based on stakeholder interview, there was no report or complaint from community on pollution to water body from company operation.</p> <ul style="list-style-type: none"> - Analysis of Air limbah perumahan by PT ATOMS Laboratorium Indonesia (KAN/LP-1576-IDN) on 28 February 2023. - Analysis of Mill rain tranch warter by PT ATOMS Laboratorium Indonesia (KAN/LP-1576-IDN) on 16 January 2023. - Analysis of mill outlet oil trap workshop water by PT ATOMS Laboratorium Indonesia (KAN/LP-1576-IDN) on 16 January 2023 	Complied
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	7.8.1b Workers have adequate access to clean water.	<p>Company conducts water quality test on each semester. Water quality test performed by accredited laboratory PT. ITEC Solution Indonesia, analysis report verified:</p> <ul style="list-style-type: none"> - Water analysis from clean water sample in worker housing "Pondok Seng Afd I KPM" dated 16 January 2023. Analysis result all parameter meets the clean water regulation (Peraturan Menteri Kesehatan No.492/Menkes/Per/IV/2010). - Water analysis from clean water sample in worker housing "Perumahan Pondok Coklat Afd II KPM" dated 16 January 2023. Analysis result all parameter meets the clean water regulation (Peraturan Menteri Kesehatan No.492/Menkes/Per/IV/2010). 	

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		<p>PT Saudara Sejati Luhur did not limit the supply of clean water to the worker.</p> <p>The result of the Water analysis is comply with relevant regulation. There is no parameter of quality above the threshold.</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>PT. Saudara Sejati Luhur has procedure for riparian management No. AA-APM-OP-1100.21-R2 dated 7 December 2015. In the document, the criteria for riparian area, lake, water source and conservation area explained. River riparian area sets at 50 meters both sides for river width <12 meters; and riparian area sets at 100 meters both sides for river width >12 meters.</p> <p>Based on field visit to Karmila river, no replanting within the buffer zone; no chemical treatment in the buffer zone, riparian area marked with signboard.</p> <p>The company has also made a plan for planting in the riverbank with woody plants that will be carried out in 2024, the company has shown a stock of woody plant seedlings in 2023 with the types of Mahogany Trees 1,332 trees, Roda Trees 999 trees, Sungkai Trees 95 trees and ohon Ketapang 50 trees.</p>	Complied
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>Monitoring on BOD carried out by accredited laboratory PT. ITEC Solution Indonesia. Based on analysis, the parameter measured under threshold as regulated in "Peraturan Menteri Lingkungan Hidup dan Tenaga Kerja No.KEP-51/MENLH/10/1995" of 5.000 mg/liter.</p> <p>The company has shown the results of wastewater analysis for January-September 2023 by PT ATOMS, where the analysis results still meet the quality standards required in the applicable laws and regulations.</p> <p>In addition, the Company has also shown evidence of liquid wastewater reporting, the latest on 26 October 2023 to the North Sumatra Provincial Environment and Forestry Office.</p>	Complied

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		The latest land application soil analysis results on 29 March 2023 by the PT Bumi Ventila Indonesia laboratory (KAN/LP-1547-IDN) number: LHU/BVI/III/2023/B-23-054. The result of effluent for land application is comply with required regulation and the BOD level is not above the threshold.	
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	Based on Mill Summary Report year 2023 the average water per tonne FFB processed reach 1.05 m ³ /ton FFB.	Complied
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	Plan for reduce fossil fuel use and optimize renewable energy stipulated under "Rencana Management Lingkungan" 2023. Point 2 stipulates fossil fuel use efficiency improved from monitoring the actual fossil fuel used. The company has documented the use of biomass in the form of shells and fibre for boiler fuel as a substitute for diesel. The company recorded an efficiency of 280 litres of diesel usage/saving for every 1200 kW.	Complied
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.	PT Saudara Sejati Luhur has identified the emission sources and pollution under document of "Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2022-2023". Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB. The assessment of pollution activities was documented in "Mitigasi Gas Rumah Kaca". All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust	Complied

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		emissions each semester to ensure air quality is comply with standard regulation. Report as per GHG calculator result displayed in annual public summary report.	
7.10.2	(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	There is no new development in the supply base of PT. Saudara Sejati Luhur, as replanting completed in 2012.	Not Applicable
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	PT Saudara Sejati Luhur has identified the significant pollutants and greenhouse gas (GHG) emissions. Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB. Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months. The Air quality based on the analysis is met the relevant regulations. For GHG emission, calculated with RSPO Palm GHG. Emission from estate operation and mill calculated and monitored, emission reduction achieved. For GHG emission, calculated with RSPO Palm GHG version 4.1. For 2022 emission from estate operation and mill calculated and monitored, emission reduction achieved.	Complied
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.	There were replanting on-going activities at Unit of certification. Replanting procedure in "Prosedur Replanting No.SOP AA-APM-OP-1100.20-R8" dated 1 May 2019. Procedure stated company will implement	Complied

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		<p>zero burning through chipping and stacking with bucket-modified excavator.</p> <p>The replanting activities recorded: felling, chipping, cutting palm stomp, Ganoderma mitigation, Legume cover crop planting, holing, planting.</p> <p>At the time of audit 1.2, replanting activities in Pulau Maria Estate for land preparation were being carried out by tractor/excavator and mechanically. No fire use for land preparation.</p>	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	<p>PT. Saudara Sejati Luhur – Pulau Maria Estate has implemented various step to prevent land and forest fire:</p> <ul style="list-style-type: none"> - Daily patrol to check hotspot and fire as per fire-prone area mapping “Peta Area Rawan Kebakaran PT. Saudara Sejati Luhur-Kebun Pulau Maria”. Based on patrol record year 2022 no hotspot or fire incident. - Company implement fire danger rating as early warning system. Based on fire danger rating record year 2019, 2020, 2021, 2022 and 2023 in general the fire danger rating at low risk. - Fire fighting tools, equipment and infrastructure is in place as per “Daftar Peralatan Pemadam Kebakaran”, this includes portable pumps, suction hose, nozzle, water hose, sickle, fire overall, etc. - Evidence of community involvement in the prevention and suppression of land fires was carried out by providing fire fighting training on 12 and 13 September 2023 in conjunction with the implementation of Corporate Share Valuae (CSV) training with Gonting Mahala Village and Batu Anam Village. Which was attended by 140 people. <p>In addition, the company has also shown proof of receipt of fire prevention and suppression system reporting to the Asahan District Environment Office and the Asahan District Agriculture and Plantation Office on 3 August 2023.</p>	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	Evidence of community involvement in the prevention and suppression of land fires was carried out by providing fire fighting training on 12 and 13	Complied

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		September 2023 in conjunction with the implementation of Corporate Share Valuae (CSV) training with Gonting Mahala Village and Batu Anam Village. Which was attended by 140 people.	
Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
PROCEDURAL NOTE for 7.12: <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests. Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).	There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018.	Complied

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7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</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>No changes on HCV Assessment.</p> <p>PT. Saudara Sejati Luhur has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" back in 2014, under "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>The HCV identification team consist of: Team leader: Dr. Ir. Nyoto Santoso, MS (RSPO HCV Assessor and HCVRNI member); Environmental service expert: Ir. A. Faizal Siregar, Msi (RSPO HCV Assessor and HCVRNI member); Vegetation expert: Eko Adhiyanto, S.Hut (RSPO HCV Assessor and HCVRNI member); Wildlife expert: Sutopo S.Hut. (RSPO HCV Assessor and HCVRNI member); Social-economic-cultural expert: Rae Birumbo (RSPO HCV Assessor and HCVRNI member); GIS: Arif Prasetyo, S.Hut (RSPO HCV Assessor and HCVRNI member).</p> <p>The HCV identification carried out with field assessment and public stakeholder consultation with surrounding communities on 1-7 April and May 2013. The HCV Identification report has been peer reviewed by Mr.Rachmad Darmawan (RSPO HCV Assessor and HCVRN member) on 01/2014.</p> <p>In the previous assessment, The total HCV identified in Pulau Maria Estate was 12.29 Ha, consist of HCV 4.1 (10.79 Ha) and HCV 6 (1.5 Ha). Based on HCV Identification Report, 2014 shows in area of Pulau Maria Estate, found 54 types of mammal, 42 types of bird, 4 types of reptile.</p>	Complied
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	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.	There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. Company carried out replanting first in 2007.	
7.12.3	(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.	Not applicable.	Not Applicable
PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.			
7.12.4	(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>No changes on HCV Assessment.</p> <p>According to the indicator 7.12.2, PT. Saudara Sejati Luhur has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" back in 2014, under "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. Company carried out replanting first in 2007.</p> <p>According to the soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i></p>	Complied

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		<p>and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.</p> <p>The same information shown in the HCV Identification Report 2014 obtain information that no peatland and other conservation areas have been identified in Pulau Maria Estate. Based on that fact, there was no specific integrated management plan needed.</p>	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	<p>No changes on HCV Assessment.</p> <p>According to the indicator 7.12.2, PT. Saudara Sejati Luhur has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" back in 2014, under "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. Company carried out replanting first in 2007.</p> <p>In addition, based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p>	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual	<p>No changes on HCV Assessment.</p> <p>According to the indicator 7.12.2, PT. Saudara Sejati Luhur has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" back in 2014, under "Laporan Final Kajian Penuh</p>	Complied

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	working for the company is found to capture, harm, collect, trade, possess or kill these species.	<p>Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. Company carried out replanting first in 2007.</p> <p>Based on HCV Identification Report, 2014 shows in area of Pulau Maria Estate there is no endangered species. Furthermore, there is no wildlife categorized as Appendix I and II CITES or IUCN Redlist.</p> <p>PT. Saudara Sejati Luhur made socialization to the employees and surrounding community on HCV area and prohibit hunting/poaching of wildlife, dated 25 February 2021. The meeting attended by village head Dusun II Gonting Malaha, 15 communities from Dusun III Gonting Malaha, 2 communities from Dusun I, 1 person from Dusun IV, village head from Dusun VI Bukit Anam, etc.</p> <p>Land cover surrounding the unit of certification is palm oil plantations, there are no forest or protected area which determined by the government. Therefore, no RTE species were found or sighted by community or workers. This result is collected from monthly monitoring of HCV aspect and HCV monitoring report 2022.</p>	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	<p>No changes on HCV Assessment.</p> <p>PT. Saudara Sejati Luhur has not review nor put monitoring report as feedback to HCV management and monitoring plan.</p>	Not Applicable
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since	There is no new planting within certified area of PT Gunung Melayu after November 2005 and /or November 2018.	Not Applicable

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	15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.		
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Gunung Melayu I POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022** for **Gunung Melayu I POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	-0.34	OER	19.49
PKO	-0.34	KER	5.25

Production	t/yr	Land Use	Ha
FFB Process	250,440	OP Planted Area	2,063
CPO Produced	48,804	OP Planted on peat	0
PK Produced	13,140	Conservation (forested)	0
		Conservation (non-forested)	12.29
		Total	2,307

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	20,375.48	0.42	594.6	0.44			20,970.08	0.86
CO ₂ Emission from fertilizer	577.59	0.01	22.06	0.02			599.65	0.03
NO ₂ Emmision	2,234.35	0.05	19.08	0.01			2,253.43	0.06
Fuel Consumption	270.81	0.01	13.76	0.01			284.57	0.02
Peat Oxidation	0	0	0	0			0	0
Sink								
Crop Sequestration	-19,313.3	-0.4	-563.6	-0.41			-19,876.90	0.01
Conservation Sequestration	0	0	0	0			0	0
Total	4,144.97	0.09	85.89	0.06	10,054		14,284.86	0.15

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**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	2,439.15	0.01
Fuel Consumption	165.3	0
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	-1,984.86	-0.01
Sales of PKS	-35,844.6	-0.14
Sales of EFB	0	0
Total	-35,225	-0.14

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	-4,442.06
PK from other source	4,313.4
Fuel Consumptions	0
Total Crusher emissions	-128.66

*This mill has no kernel crusher operation.

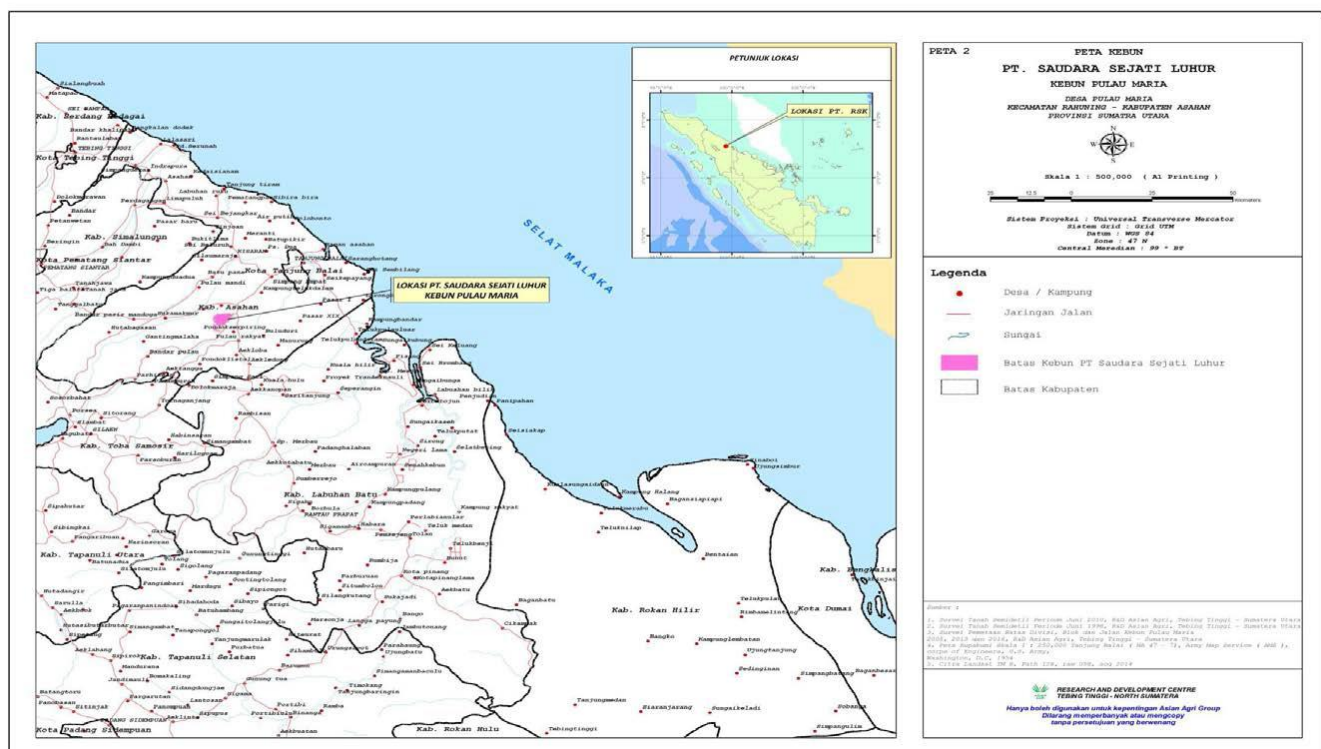
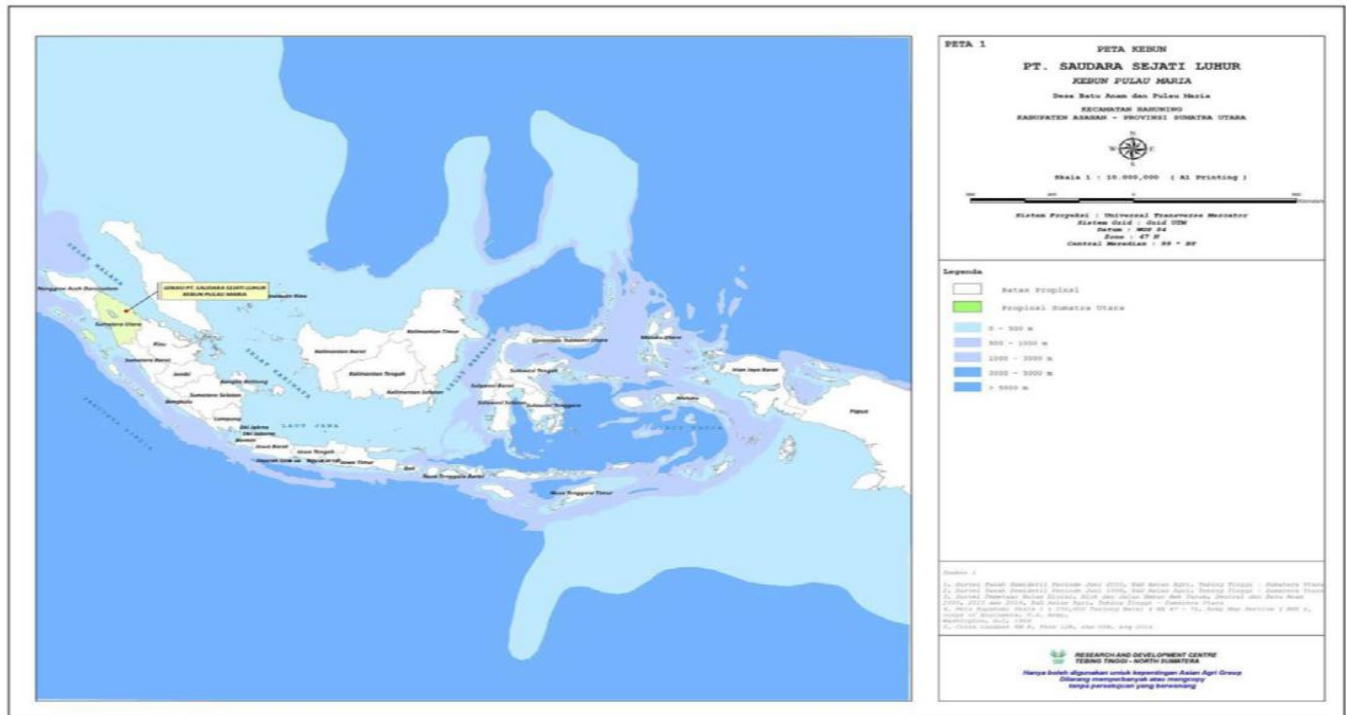
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

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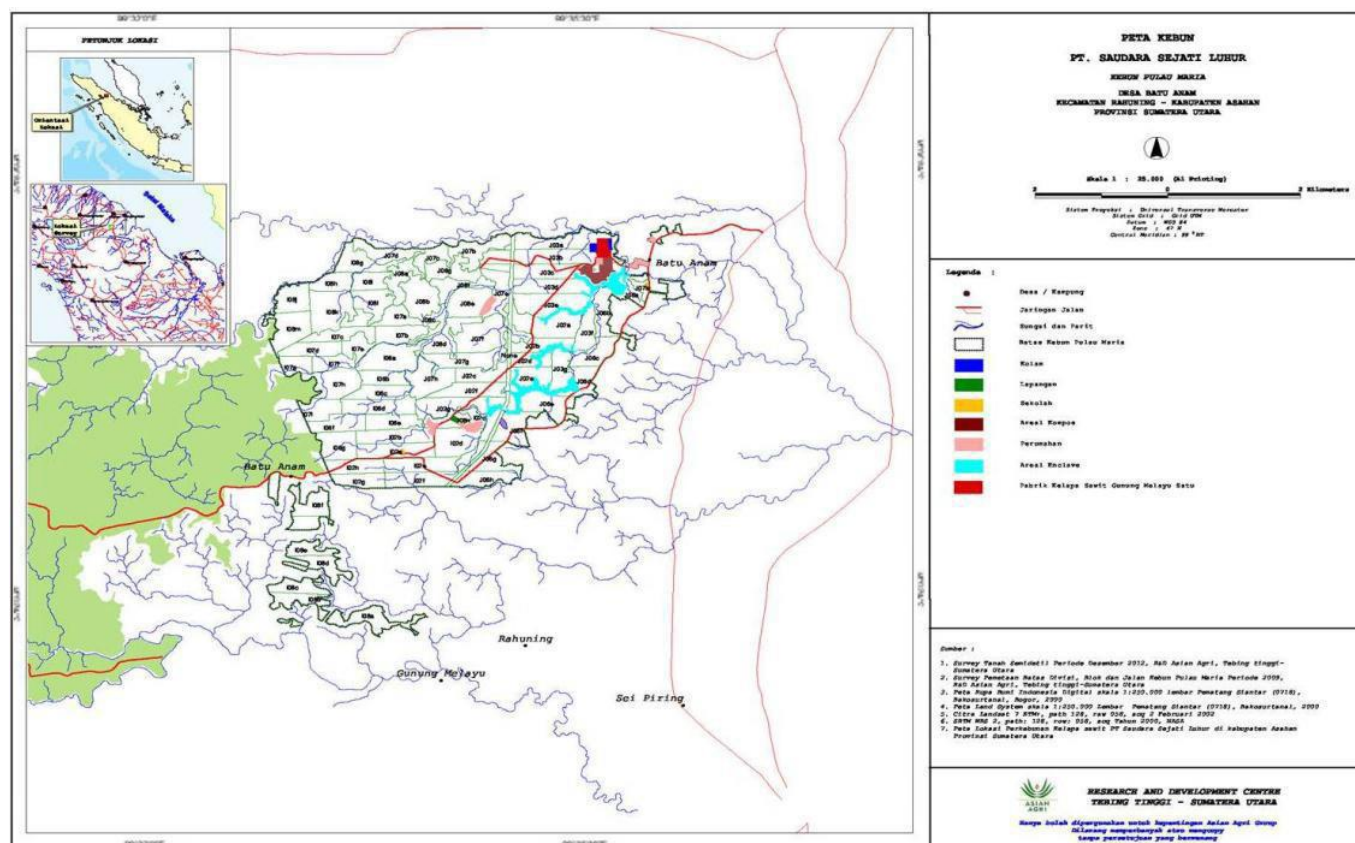
Appendix C: Location Map of Certification Unit and Supply bases



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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