

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**☐ **Initial Assessment**☒ **Annual Surveillance Assessment (1_1)**☐ **Recertification Assessment** (Choose an item.)☒ **Extension of Scope**

Client Company Name / Parent Company: PT Sampoerna Agro Tbk
Client Company / Parent Company Address: Jl. Basuki Rahmat No. 788, Talang Aman Kemuning Kota Palembang, Sumatera Selatan 30128 Indonesia
Certification Unit: PT Usaha Agro Indonesia Usaha Agro Indonesia Palm Oil Mill Location of Certification Unit: Jambi Village, Manis Mata Sub-District, Ketapang District, West Kalimantan Province, 78864, Indonesia
Date of Final Report: 27/08/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Sampoerna Agro Tbk		
RSPO Membership Number	1-0031-07-000-00	Membership Approval Date	09/01/2007
Address	Jl. Basuki Rahmat No. 788, Talang Aman Kemuning Kota Palembang, Sumatera Selatan 30128 Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Usaha Agro Indonesia - Usaha Agro Indonesia Palm Oil Mill		
Location / Address	Jambi Village, Manis Mata Sub-District, Ketapang District, West Kalimantan Province 78864, Indonesia		
Website	www.sampoernaagro.com		
Management Representative	Ms. Yusi Rosalina	E-mail	yusi.rosalina@sampoernaagro.com
Telephone	+62 812-7123-8226	Facsimile	+62 711 811585

2. Certification Information			
Certificate Number	RSPO 790206	Certificate Start Date	21/06/2023
Date of First Certification	21/06/2018	Certificate Expiry Date	20/06/2028
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK).		
Visit Objectives	The objective of the assessment was to conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 th April 2020.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" 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	45 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
AML-ISPO-002.1	ISPO	PT Agri Mandiri Lestari	2 August 2027

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
UAI Palm Oil Mill	Jambi Village, Manis Mata Sub-District, Ketapang District, West Kalimantan Province Indonesia	2° 41' 00.40" S	110° 58' 32.00" E
Ulin Agro Estate	Jambi Village, Manis Mata Sub-District, Ketapang District, West Kalimantan Province Indonesia	2° 40' 36.30" S	111° 01' 45.40" E
Kruing Agro Estate	Jambi Village, Manis Mata Sub-District, Ketapang District, West Kalimantan Province Indonesia	2° 41' 05.71" S	110° 58' 53.66" E
Meranti Agro Estate	Jambi Village, Manis Mata Sub-District, Ketapang District, West Kalimantan Province Indonesia	2° 37' 01.20" S	110° 56' 27.60" E
Koperasi Perkebunan Jambi Mekar Jaya Sempurna (380 smallholders)	Jambi Village, Manis Mata Sub-District, Ketapang District, West Kalimantan Province Indonesia	2° 40' 03.86" S	111° 01' 14.88" E
Koperasi Perkebunan Sempurna Mandiri (44 smallholders)	Suren Village & Buntar Village, Kendawangan Sub-District, Ketapang District, West Kalimantan Province Indonesia	2° 38' 46.64" S	110° 56' 43.42" E
Koperasi Perkebunan Sempurna Bersatu* (140 smallholders)	Danau Buntar Village, Kendawangan Sub-District, Ketapang District, West Kalimantan Province Indonesia	2° 33' 39.6" S	110° 56' 38.04" E
Notes: (1) Koperasi Perkebunan Jambi Mekar Jaya Sempurna (JMJS), Koperasi Perkebunan Sempurna Mandiri (SM), Koperasi Perkebunan Sempurna Bersatu (SB) is fully managed by PT Usaha Agro Indonesia. The Koperasi are treated as a Division of the Estate. JMJS is under Ulin Agro Estate, SM is under Kruing Agro Estate, SB is under Meranti Agro Estate. (2) * There is Extension Scope			

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
Ulin Agro Estate	2,825.96	40.91	327.14	3,194.01	88.48
Kruing Agro Estate	2,634.74	167.32	288.75	3,334.64	79.01
Meranti Agro Estate	2,493.98	24.57	492.12	3,141.67	79.38
Koperasi Perkebunan Jambi Mekar Jaya Sempurna	1,098.38	0.00	0.00	1,098.38	100.00
Koperasi Perkebunan Sempurna Mandiri	796.83	0.00	0.00	796.83	100.00
Koperasi Perkebunan Sempurna Bersatu*	273.11	0.00	0.00	273.11	100.00
Total	10,123.00	232.80	1,108.01	11,838.64	85.50
Notes: (1) Based on the management statement, changes in area compared to previous public summary report are due to re-measuring and re-blocking for each estate. (2) * There is Extension Scope					

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Ulin Agro Estate	974.72	1,337.64	513.60	0.00	1,851.24	974.72
Kruing Agro Estate	276.18	1,543.27	815.29	0.00	2,358.56	276.18
Meranti Agro Estate	0.00	877.97	1,616.01	0.00	2,493.98	0.00
Koperasi Perkebunan Jambi Mekar Jaya Sempurna	0.00	867.78	230.60	0.00	1,098.38	0.00
Koperasi Perkebunan Sempurna Mandiri	0.00	796.83	0.00	0.00	796.83	0.00
Koperasi Perkebunan Sempurna Bersatu*	0.00	0.00	273.11	0.00	273.11	0.00
Total (ha)	1,250.90	5,423.49	3,448.61	0.00	8,872.10	1,250.90
Note: Only Mature area is considered as production area						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated Last Year (21 Jun 2023 – 20 Jun 2024)	Actual (Mar 2023 – Feb 2024)		Forecast (21 Jun 2024 – 20 Jun 2025)
		Previous License Period (Mar – Mei 2023)	Current License Period (Jun 2023 – Feb 2024)	
Ulin Agro Estate	31,710.00	2,176.00	16,149.00	32,674.00
Kruing Agro Estate	42,102.00	6,322.00	27,073.00	47,425.00
Meranti Agro Estate	70,247.00	15,113.00	45,081.00	62,349.00
Koperasi Perkebunan Jambi Mekar Jaya Sempurna	22,468.00	2,718.00	16,894.00	23,066.00
Koperasi Perkebunan Sempurna Mandiri	14,144.00	1,684.00	12,087.00	15,937.00
Koperasi Perkebunan Sempurna Bersatu*	0.00	0.00	0.00	5,462.00
Total	180,671.00	145,297.00		186,913.00
Note:				
(1) * There is Extension Scope				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (21 Jun 2023 – 20 Jun 2024)	Actual (Mar 2023 – Feb 2024)		Forecast (21 Jun 2024 – 20 Jun 2025)
		Previous license period (Mar – Mei 2023)	Current license period (Jun 2023 – Feb 2024)	
Nil		Nil	Nil	
Total		Nil		
Note:				

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (21 Jun 2023 – 20 Jun 2024)	Actual (Mar 2023 – Feb 2024)		Forecast (21 Jun 2024 – 20 Jun 2025)
		Previous license period (Mar – Mei 2023)	Current license period (Jun 2023 – Feb 2024)	
PT Anugerah Palm Indonesia	N/A	49.00	53.00	N/A
KopBun Sempurna Bersatu	N/A	2,184.00	5,241.00	N/A
PT UAI NPP Sanction Area	N/A	4,298.00	14,586.00	N/A
PT Sungai Rangit	N/A	2,754.00	344.00	N/A
Total	N/A	29,509.00		N/A
Note:				

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	March 2023	8,951	1,531	10,482
2	April 2023	7,358	1,331	8,689
3	May 2023	11,704	3,059	14,763
4	June 2023	12,583	3,286	15,869
5	July 2023	14,507	2,442	16,949
6	August 2023	14,172	2,380	16,552
7	September 2023	13,233	2,165	15,398
8	October 2023	13,856	3,352	17,208
9	November 2023	14,825	2,703	17,528
10	December 2023	11,972	2,616	14,588
11	January 2024	11,789	2,415	14,204
12	February 2024	10,347	2,229	12,576
TOTAL		145,297	29,509	174,806
Note:				

10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimated last year (21 Jun 2023 – 20 Jun 2024)	Actual (Mar 2023 – Feb 2024)		Forecast (21 Jun 2024 – 20 Jun 2025)	
	Previous license period (Mar – Mei 2023)	Current license period (Jun 2023 – Feb 2024)		
FFB	FFB		FFB	
180,671 mt	28,013 mt	117,284 mt	186,913 mt	
	TOTAL	145,297 mt		
CPO (OER: 24.50 %)	CPO (OER: 23.99 %)		CPO (OER: 24.50 %)	
44,264 mt	6,575.88 mt	28,275.41 mt	45,793 mt	
	TOTAL	34,851.29 mt		
PK (KER: 4.00 %)	PK (KER:4.17 %)		PK (KER: 4.00 %)	
7,227 mt	780.03 mt	5,277.81 mt	7,476 mt	
	TOTAL	6,057.84 mt		
Note:				

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	March 2023	2,097.21	356.96
2	April 2023	1,701.31	289.94
3	May 2023	2,777.36	490.09
4	June 2023	2,933.81	513.7
5	July 2023	3,365.91	605.46
6	August 2023	3,555.06	624.29
7	September 2023	3,332.73	575.98
8	October 2023	3,250.00	621.18
9	November 2023	3,574.83	745.35
10	December 2023	2,906.02	581.4
11	January 2024	2,809.02	532.69
12	February 2024	2,548.03	477.76
	TOTAL	34,851.29	6,057.84
Note:			

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11. Summary of Actual Volume sold					
Current License period (Jun 2023 – Feb 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	7,200.00	0.00	0.00	21,384.00	28,584.00
PK (MT)	2,307.85	0.00	0.00	2,355.00	4,662.85
Credits	0	0.00	0.00	0	0
Previous License period (Mar – May 2023)					
CPO (MT)	0.00	0.00	0.00	5,950.00	5,950.00
PK (MT)	1,045.03	0.00	0.00	302.12	1,347.15
Credits	0.00	0.00	0.00	0.00	0.00
Note: Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. Cisadane Raya Chemicals	C556755	7,200.00	0.00
2	PT. Sumber Indah Perkasa	CB144841	0.00	2,307.85
3	PT. Smart Tbk.	CB140353	0.00	1,045.03
TOTAL			7,200.00	3,352.88
Note:				

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

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	PT. Smart Tbk.	11,850.00	2,657.12
2	PT. Megasurya Mas	11,700.00	0.00
3	PT. Bina Karya Prima	3,784.00	0.00
TOTAL		27,334.00	2,657.12
Note:			

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
	Estimated last year (21 Jun 2023 – 20 Jun 2024)			Actual (Mar 2023 – Feb 2024)			Forecast (21 Jun 2024 – 20 Jun 2025)		
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	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IS-CSPO	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IS-CSPKO	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IS-CSPKE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CSPK	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A
Note: 1 mt = 1 credit						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Jun 2023 – Feb 2024)							
Credits	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Previous License period (Mar – May 2023)							
Credits	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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

Section 2: Assessment Process

Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 18 – 23 March 2024. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on 20 – 22 May 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 Unit of Certification with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)
UAI Palm Oil Mill	X	X	X	X	X
Ulin Agro Estate	X	X	X	X	X
Kruing Agro Estate	X	X	X	X	X
Meranti Agro Estate	X	X	X	X	X
Koperasi Perkebunan Jambi Mekar Jaya Sempurna	X	X	X	X	X
Koperasi Perkebunan Sempurna Mandiri	X	X	X	X	X
Koperasi Perkebunan Sempurna Bersatu		X	X	X	X

Tentative Date of Next Visit: March 17, 2025 - March 22, 2025

Total Number of Mandays: 24 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Naila Karima	Team Leader	<p>Education: Holds a bachelor's degree majoring Occupational Safety and Health, Faculty of Public Health, University of Indonesia.</p> <p>Work Experience: 10 years working experience as auditor since 2012 covering RSPO and ISPO.</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, ISPO Auditor/Lead Auditor Course, SA8000, RSPO Labour Auditing Training, RSPO ISH Standard Training Course, ISO 9001, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: <input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements </p>

		<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)
Eko Purwanto	Team Member	<p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB).</p> <p>Work Experience: Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. 10 years working experience as auditor since 2012 covering ISO9001, RSPO and ISPO.</p> <p>Training attended: Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, RSPO P&C 2018 Refresher Training, Sustainability Reporting Assurance Training, RSPO P&C Lead Auditor Refresher Course, RSPO Supply Chain Certification Refresher Course, RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, Elaborating on the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing, RABQSA accredited Lead Auditor Training of Environment Management System, Endorsed RSPO Green House Gas (GHG) Training for Trainer, Endorsed RSPO P&C Lead Auditor Training, Understanding Environmental Management System (EMS), Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training, RABQSA accredited Lead Auditor Training of Quality Management System, RSPO Independent Smallholder Training by RSPO Secretariat and Endorsed RSPO Refresher Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English:</p> <p>Aspect covered in this audit:</p> <input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" 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)
Mujinius Jalaraya	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 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</p>

		<p>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 checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Edy Widodo	Team Member	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Dr. Suhaili Bin Sahari	Peer Reviewer	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management</p>

		<p>decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. Occupation Health & Safety 3. ISO 14001:2015 Standard 4. RSPO Standards: RSPO P&C 2018 MY-NI 2019 5. MSPO Standards: MS 2530:2013 part 1, 2 , 3 and 4 6. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 7. HACCP MS 1480:2019 8. GAP Standard: Global GAP, Euro GAP 9. ASI Peer Reviewer training
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Accompanying Persons:

Name	Role
Nil	

2.3 Assessment Plan

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

Date	Time	Subjects	Naila	Eko	Muji	Edy
Monday, 18/03/2024	06.00 – 07.20	Flight Jakarta – Pangkalan Bun (Citilink QG 470)	√	√	√	√
	08.00 – 14.00	Travel Pangkalan Bun - Site	√	√	√	√
	14.00 – 16.00	Opening Meeting: - Presentation By Lead Auditor - Confirmation audit scope, requirements, document access permission and clarifying audit plan	√	√	√	√
	16.00 – 17.00	Document and record verification Data verification of RSPO P&C (Best management practices Mill, OHS, EMS, Social and Labour)	√	√	√	√

Date	Time	Subjects	Naila	Eko	Muji	Edy
Tuesday, 19/03/2024	08.00 – 12.00	Field visit to Kruing Agro Estate & Koperasi Perkebunan Sempurna Mandiri <ul style="list-style-type: none"> - 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, HCV area, riparian zone 		√	√	√
	08.00 – 12.00	Stakeholder consultation <ul style="list-style-type: none"> - Stakeholder consultation to relevant agencies of Ketapang Regency - Contractor (FFB Transporter, Land Clearing, etc). - Worker union, Gender committee - Local NGO 	√			
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 16.30	Document and records verification	√	√	√	
	14.00 – 16.30	Stakeholder consultation <ul style="list-style-type: none"> - Village Head, Community leader - Previous Landowner 				√
	16.30 – 17.00	Wash up meeting & Reporting	√	√	√	√

Date	Time	Subjects	Naila	Eko	Muji	Edy
Wednesday 20/03/2024	08.00 – 12.00	Field visit to Ulin Agro Estate & Koperasi Kebun Jambi Mekar Jaya Sempurna <ul style="list-style-type: none"> - 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, HCV area, riparian zone 	√	√	√	√
	12.00-14.00	Break	√	√	√	√
	14.00-16.30	Field visit to UAI Palm Oil Mill to verify: <ul style="list-style-type: none"> - Best Management Practice for Mill Processing and RSPO Supply Chain Certification Standard - Element for Palm Oil Mill – site visit to check on FFB receiving, FFB process, CPO and PK dispatch, document, and record keeping. - Visit to POM housing: house condition, water supplies, sanitation, access to affordable food, welfare amenities. - 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. 	√	√	√	√

Date	Time	Subjects	Naila	Eko	Muji	Edy
	16.30-17.00	Wash up meeting and Reporting	√	√	√	√
Thursday 21/03/2024	08.00 – 12.00	Field visit to Meranti Agro Estate <ul style="list-style-type: none"> - 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, HCV area, riparian zone 	√	√	√	√
	12.00-14.00	Break	√	√	√	√
	14.00-16.30	Document and records verification	√	√	√	√
	16.30-17.00	Wash up meeting and Reporting	√	√	√	√
Friday 22/03/2024	08.00 – 12.00	Field visit to Koperasi Perkebunan Sempurna Bersatu <ul style="list-style-type: none"> - 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 boundary poles, border with surrounding entities, HCV area, riparian zone 	√	√	√	√
	12.00-14.00	Break	√	√	√	√

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Date	Time	Subjects	Naila	Eko	Muji	Edy
	14.00-16.30	Document and records verification	✓	✓	✓	✓
	16.30-17.00	Wash up meeting and Reporting	✓	✓	✓	✓
Saturday 23/03/2024	08.00-12.00	Document and records verification	✓	✓	✓	✓
	12.00-14.00	Break	✓	✓	✓	✓
	14.00-16.00	Reporting and auditor discussion	✓	✓	✓	✓
	16.00-17.00	Closing Meeting	✓	✓	✓	✓

NCR Close Out Visit

Date	Time	Subjects	Naila
Monday, 20/05/2024	06.15 – 07.35	Flight Jakarta – Pangkalan Bun (Citilink QG 470)	✓
	08.00 – 13.00	Travel Pangkalan Bun – Site (PT Usaha Agro Indonesia)	✓
	13.00 – 14.00	Opening Meeting: - Presentation By Lead Auditor - Confirmation CAP, requirements, document access permission and clarifying audit plan	✓
	14.00 – 17.00	Document Review and Site observation related to NC - RSPO P&C 2018 – INA NI 2020 1. Indicator 2.1.2 (Recurring Minor) 2. Indicator 3.6.1 (Recurring Critical) 3. Indicator 3.8.9 (Critical)	✓
Tuesday, 21/05/2024	08.00 – 12.00	Document Review and Site observation related to NC - RSPO P&C 2018 – INA NI 2020 4. Indicator 4.4.3 (Critical) 5. Indicator 5.2.2 (Recurring Minor) 6. Indicator 6.2.2 (Recurring Critical) 7. Indicator 6.7.4 (Recurring Minor) 8. Indicator 7.12.4 (Critical)	✓

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Date	Time	Subjects	Naila
	12.00 – 14.00	Break	✓
	14.00 – 15.00	Discussion if there any outstanding issues	✓
	15.00 – 15.30	Report Preparation	✓
	15.30 – 16.30	Closing Meeting <ul style="list-style-type: none"> • Presentation of NCR Report • Comments, Responses and Questions 	✓
	16.30 – 20.00	Travel Site – Pangkalan Bun Overnight at Pangkalan Bun	✓
Wednesday 22/05/2024	08.05 –	Flight Pangkalan Bun – Jakarta (Citilink QG 471)	✓
		NCR Reporting (Galaxy E-Report & PGA)	✓

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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 Sampoerna Agro Tbk revised their 'RSPO Certification Timebound Plan' most recently on 30 May 2024. The timebound plan include name of all subsidiary companies, all estates and all mills under PT Sampoerna Agro Tbk.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There are several estates and mills that have not yet received certification for various reasons, including ongoing RaCP and land title verification in progress. PT Sampoerna Agro Tbk obtained RSPO Membership on 9 January 2007. PT Sampoerna Agro Tbk submitted the updated RSPO Timebound Plan to RSPO Secretariat on 30 May 2024, RSPO Secretariat has approved the timebound plan on 01 August 2024	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No new land acquisition has been informed. As of 30 May 2024 PT Sampoerna Agro Tbk communicated the modifications and the extension of their Timebound Plan (TBP) to the RSPO Secretariat via email, and the RSPO acknowledged receipt of this communication on 01 August 2024.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	As of 30 May 2024 PT Sampoerna Agro Tbk communicated the modifications and the extension of their Timebound Plan (TBP) to the RSPO Secretariat via email, and the RSPO acknowledged receipt of this communication on 01 August 2024.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	The revised time bound plan reviewed by auditor team during this assessment.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there is no deviations in the time-bound plan. Each certification unit has a specified timeline for the audit implementation	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, there is no fundamental failure. Each management unit has a specified timeline for the audit implementation.	Complied
Un-Certified Units or Holdings		

<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>PT Sampoerna Agro Tbk has completed self-assessments for all its subsidiary companies, as detailed in the Internal Assessment regarding compliance with Clause 5.5.3 (a) – (d) of the RSPO Certification System.</p> <p>Based on the RSPO RaCP Tracker, Audit team noted 9 MUs with potential liability, 9 MUs with LUCA submitted, 6 MUs with LUCAs review completed, 6 MUs with CN required, 0 MUs with CN submitted, 0 MUs with CN approved, 0 MUs with CP submitted, 0 MU with CP endorsed, 7 MUs with RP required, 0 MU with RP submitted, 0 MU with RP approved.</p> <p>Based on Sampoerna Agro – LUCA review status: There are management units with Remediation Plan required, because of planting on peat and/or riparian prior to HCV assessment, which is PT Telaga Hikmah (additional 229 ha); PT Mutiara Bunda Jaya; Plasma PT Mutiara Bunda Jaya; Plasma PT Telaga Hikmah; PT Sawit Selatan; PT Sungai Rangit and PT Lanang Agro Bersatu.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>PT Sampoerna Agro Tbk has completed self-assessments for all its subsidiary companies, including for new planting after 1 January 2010, as detailed in the Internal Assessment regarding compliance with Clause 5.5.3 (a) – (d) of the RSPO Certification System.</p> <p>Based on the RSPO RaCP Tracker, Audit team noted 9 MUs with potential liability, 9 MUs with LUCA submitted, 6 MUs with LUCAs review completed, 6 MUs with CN required, 0 MUs with CN submitted, 0 MUs with CN approved, 0 MUs with CP submitted, 0 MU with CP endorsed, 7 MUs with RP required, 0 MU with RP submitted, 0 MU with RP approved.</p> <p>Based on Sampoerna Agro – LUCA review status: There are management units with Remediation Plan required, because of planting on peat and/or riparian prior to HCV assessment, which is PT Telaga Hikmah (additional 229 ha); PT Mutiara Bunda Jaya; Plasma PT Mutiara Bunda Jaya; Plasma PT Telaga Hikmah; PT Sawit Selatan; PT Sungai Rangit and PT Lanang Agro Bersatu.</p> <p>Based on search to the RSPO website, there is no NPP approved for the subsidiary of PT Sampoerna Agro, Tbk. Currently, there are NPP assessment conducted, which still under proses of review and revision, that is for PT Kedurang Prakarsa Nabati at Bengkayang Regency, and for area of PT UAI under IUP 334/DPMPTSP-D/2020 covers 612 Ha.</p>	<p>Complied</p>

<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>PT Sampoerna Agro Tbk has completed self-assessments for all its subsidiary companies, as detailed in the Internal Assessment regarding compliance with Clause 5.5.3 (a) – (d) of the RSPO Certification System.</p> <p>There is documented proof of verification carried out by PT Sampoerna Agro Tbk for all certification units to ensure that any land conflicts are being resolved through a mutually agreed process.</p> <p>The unit of certification (UoC) has submitted evidence of self-assessments conducted on all of its uncertified management units. The checklists utilized during these self-assessments cover all the indicators and requirements specified in Section 5.5 of the RSPO Certification System document. Additionally, it has been confirmed that the UoC has provided a positive assurance statement, affirming compliance for every uncertified management unit.</p> <p>Based on the RSPO Case Tracker and web search, Audit team noted there was no active complaint related land disputes.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>PT Sampoerna Agro Tbk has completed self-assessments for all its subsidiary companies, as detailed in the Internal Assessment regarding compliance with Clause 5.5.3 (a) – (d) of the RSPO Certification System.</p> <p>There is documented proof of verification carried out by PT Sampoerna Agro Tbk for all certification units to ensure that no labour disputes has been reported/identified within any of the uncertified management units.</p> <p>The unit of certification (UoC) has submitted evidence of self-assessments conducted on all of its uncertified management units. The checklists utilized during these self-assessments cover all the indicators and requirements specified in Section 5.5 of the RSPO Certification System document. Additionally, it has been confirmed that the UoC has provided a positive assurance statement, affirming compliance for every uncertified management unit.</p> <p>Based on the RSPO Case Tracker and web search, Audit team noted there was no active complaint related to labour disputes.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>PT Sampoerna Agro Tbk has completed self-assessments for all its subsidiary companies, as detailed in the Internal Assessment regarding</p>	<p>Complied</p>

	<p>compliance with Clause 5.5.3 (a) – (d) of the RSPO Certification System.</p> <p>There is documented proof of verification carried out by PT Sampoerna Agro Tbk for all certification units to ensure that no legal non-compliance has been reported/ identified within any of the uncertified management units.</p> <p>The unit of certification (UoC) has submitted evidence of self-assessments conducted on all of its uncertified management units. The checklists utilized during these self-assessments cover all the indicators and requirements specified in Section 5.5 of the RSPO Certification System document. Additionally, it has been confirmed that the UoC has provided a positive assurance statement, affirming compliance for every uncertified management unit.</p> <p>Based on the RSPO Case Tracker and web search, Audit team noted there was no active complaint related legal non-compliance.</p>	
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>The unit of certification (UoC) has submitted evidence of self-assessments conducted on all of its uncertified management units. The checklists utilized during these self-assessments cover all the indicators and requirements specified in Section 5.5 of the RSPO Certification System document. Additionally, it has been confirmed that the UoC has provided a positive assurance statement, affirming compliance for every uncertified management unit.</p> <p>For example:</p> <ul style="list-style-type: none"> - Self-Assessment Report of PT Usaha Agro Indonesia – Sahara Estate and Smallholder carried out on 14 – 15 December 2023. - Self-Assessment Report of PT Usaha Agro Indonesia – Koperasi Kebun Sempurna Bersatu carried out on 21 – 22 December 2023. - Self-Assessment Report of PT Lanang Agro Bersatu – Bukit Subur Estate, Bukit Makmur estate & Smallholder carried out on 23 – 24 November 2023. - Self-Assessment Report of PT Nusantara Sarana Alam – Gunung Alam Estate & Nusantara Sarana Alam Smallholder carried out on 16 – 17 November 2023. 	Complied
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If</p>	<p>Yes, there are critical (Major) non-compliance raised during internal audits to uncertified management units. PT Sampoerna Agro Tbk has prepared correction and corrective action.</p>	Complied

yes is the NC(s) actively addressed with RSPO?	<p>For example:</p> <ul style="list-style-type: none"> - Self-Assessment Report of PT Usaha Agro Indonesia – Sahara Estate and Smallholder; Internal audit team issued NC related to 2.1.3, 4.2.2, 4.5.4 & 7.12; management has prepared correction and corrective action including date of completion. - Self-Assessment Report of PT Usaha Agro Indonesia – Koperasi Kebun Sempurna Bersatu; Internal audit team has issued no NC. - Self-Assessment Report of PT Lanang Agro Bersatu – Bukit Subur Estate, Bukit Makmur estate & Smallholder; Internal audit team has issued no NC. - Self-Assessment Report of PT Nusantara Sarana Alam – Gunung Alam Estate & Nusantara Sarana Alam Smallholder; Internal audit team has issued no NC. 	
Have there been any stakeholder (including NGO) consultation conducted?	<p>Audit team checked on Self-Assessment Reports and verified the stakeholder consultation has been carried out, e.g. with the District Head, District Police, Village non-commissioned officer, Village Head, youth and community leader.</p> <p>Prior to this recertification assessment, Audit team sent email to Wetlands, Sawit Watch, Aid Environment, WALHI, WWF, Forest Watch Indonesia, WCS Indonesia, LINKS and Solidaridad, to obtain stakeholder comment, until assessment ends audit team did not received any response.</p>	Complied

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.	PT Usaha Agro Indonesia – Usaha Agro Indonesia Palm Oil Mill initially certified on 21 June 2018. For the scheme smallholder, Koperasi Perkebunan Jambi Mekar Jaya Sempurna and Koperasi Perkebunan Sempurna Mandiri have been certified since ASA 2, and for Koperasi Perkebunan Sempurna Bersatu audit the extension of scope in 2024.	Complied

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Remarks
				Latitude	Longitude					
PT Aek Tarum	Indonesia	Mill Belida	Desa Sumber Baru, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8404	104.9698	0.00	Certified	2011	2011	-
	Indonesia	Estate Belida	Desa Sumber Baru, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	3.8275	105.0242	3,155.50	Certified	2011	2011	
	Indonesia	Estate Permata Bunda Satu	Desa Sumber Baru, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8275	105.0242	552.24	Certified	2016	2016	
	Indonesia	KUD Panca Sawit Makmur	Desa Nusa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8047	105.1063	945.63	Certified	2016	2016	
	Indonesia	KUD Rahayu Bhakti	Desa Sumber Baru, kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8344	104.9928	748.62	Certified	2017	2017	
	Indonesia	KUD Mulya Jaya	Desa Mulya Jaya, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8520	105.0456	1,044.73	Certified	2017	2017	
	Indonesia	KUD Mekar Sari	Desa Mekar Wangi, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8437	105.0848	1,049.05	Certified	2017	2017	
	Indonesia	KUD Sumber Rejeki	Desa Karya Mukti, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8759	105.0682	497.36	Certified	2017	2017	
	Indonesia	KUD Permata Bunda	Desa Mataram Jaya, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7798	105.0508	1,128.27	Certified	2018	2018	
	Indonesia	KUD Subur Makmur	Desa Cipta Sari, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7508	104.9922	1,219.33	Certified	2018	2018	
	Indonesia	KUD Karya Makmur	Desa Sumbu Sari, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7779	105.0060	1,301.91	Certified	2017	2017	
PT Mutiara Bunda Jaya	Indonesia	Mill Permata Bunda	Desa Margo Bhakti, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.9428	105.1131	0.00	Certified	2016	2016	
	Indonesia	Estate Mesuji	Desa Pematang Panggang, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan.	-4.0268	105.0268	2,439.80	Certified	2011	2011	

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				Latitude	Longitude					
	Indonesia	Estate Surya Adi	Desa Surya Adi, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-4.0102	105.0578	588.97	Certified	2016	2016	
	Indonesia	KUD Bina Sawit Utama	Desa Kali Deras, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-4.0703	105.0127	1,017.52	Not Certified	2024	-	
	Indonesia	KUD Citra Sawit Mandiri	Desa Sumber Deras, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-4.0728	105.0395	738.47	Certified	2018	2018	
	Indonesia	KUD Marga Mulya*	Desa Makarti Mulya, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.5572	105.1629	2,008.99	Certified	2018	2018	
	Indonesia	KUD Surya Bhakti	Desa Margo Bhakti, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.9541	105.0733	1,551.40	Certified	2018	2018	
	Indonesia	KUD Surya Adi	Desa Surya Adi, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.9845	105.0320	2,053.45	Certified	2018	2018	
	Indonesia	KUD Sinar Jaya	Desa Jaya Bhakti, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.9279	105.0263	2,092.28	Certified	2018	2018	
	Indonesia	KUD Tunas Harapan	Desa Suryakarta, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-4.0691	104.9836	766.66	Certified	2018	2018	
PT Gunung Tua Abadi	Indonesia	Mill Sumber Sawit	Desa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8064	105.1719	-	Certified	2016	2016	
	Indonesia	Estate Permata Bunda Dua	Desa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7848	105.1589	1,370.50	Certified	2016	2016	
	Indonesia	Estate Sumber Sawit	Desa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8126	105.1736	5,032.00	Certified	2016	2016	
	Indonesia	Estate Hikmah Tiga	Desa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7167	105.2081	3,120.00	Certified	2017	2017	
	Indonesia	Estate Hikmah Lima	Desa Pagar Dewa, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7379	105.2394	2,327.00	Certified	2017	2017	
	Indonesia	Estate Hikmah Lima Estate (HGU 2019)	Desa Pagar Dewa, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7379	105.2394	229.28	Not Certified	2023	-	audit in 2023, certificate will be issued in 2024

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	Indonesia	Estate Limau Kesturi	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.7148	105.6496	6,734.12	Not Certified	2023	-	audit in 2023, certificate will be issued in 2024
	Indonesia	Estate Jaya Permai	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.8369	105.6608	3,802.75	Not Certified	2023	2023	
	Indonesia	Estate Nawa Surya	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.6753	105.6570	7,450.91	Not Certified	2023	2023	
	Indonesia	Estate Puncak Terang	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.7418	105.7466	3,410.88	Not Certified	2023	-	audit in 2023, certificate will be issued in 2024
	Indonesia	KUD Makmur Bersama	Desa Dabuk Makmur, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7722	105.1528	503.27	Not Certified	2024	-	uncomplete land title SHM (sertifikat Hak Milik) process for all smallholders
	Indonesia	KUD Dewa Makmur	Desa Pagar Dewa, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.7791	105.2296	2,000	Certified	2017	2017	
	Indonesia	KUD Jeruju Bhakti Mandiri	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.6247	105.6313	170.00	Not Certified	2024	-	
	Indonesia	KUD Supas Maju Bersama	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.7669	105.6135	170.00	Not Certified	2024	-	
	Indonesia	KUD Surya Gajah Dewa	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.7285	105.7957	1,921.00	Not Certified	2024	-	
PT Telaga Hikmah	Indonesia	Mill Telaga Hikmah	Desa Sumber Hidup, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5985	105.0588	0	Certified	2018	2018	
	Indonesia	Estate Tanjung Sari	Desa Rantau Durian II, Kec. Lempuing Jaya, Kab. OKI, Prov. Sumatera Selatan	-3.6055	104.9264	3,873.50	Certified	2021	2022	
	Indonesia	Estate Mega Terang	Desa Sungai Menang, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.6990	105.3623	2,790.30	Certified	2021	2022	

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	Indonesia	Estate Sepucuk	Desa Cinta Jaya, Kec. Pedamaran, kab. OKI, Prov. Sumatera Selatan	-3.5341	104.9467	1,216.84	Certified	2021	2022	
	Indonesia	Estate Hikmah Satu	Desa Sumber Hidup, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.6031	105.0815	3,752.30	Certified	2018	2018	
	Indonesia	Estate Hikmah Empat	Desa Sido Mulyo, Kec. Sungai Menang, Kab. OKI, Sumatera Selatan	-3.6403	105.2589	3,766.10	Certified	2019	2019	
	Indonesia	Estate Gading Jaya	Desa Kayu Labu, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5794	105.1887	3,243.46	Certified	2021	2022	
	Indonesia	KUD Permata Indah	Desa Sungai Menang, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.6353	105.3192	344.14	Not Certified	2024	-	
	Indonesia	KUD Tanjung Mesayu	Desa Tanjung Sari I, Kec. Lempuing Jaya, Kab. OKI, Prov. Sumatera Selatan	-3.5914	104.9545	705.30	Not Certified	2023	-	audit in 2023, certificate will be issued in 2024
	Indonesia	KUD Sumber Makmur	Desa Rantau Durian II, Kec. Lempuing Jaya, Kab. OKI, Prov. Sumatera Selatan	-3.5566	104.9637	568.00	Not Certified	2023	-	audit in 2023, certificate will be issued in 2024
	Indonesia	KUD Sari Makmur	Desa Tanjung Sari II, Kec. Lempuing Jaya, Kab. OKI, Prov. Sumatera Selatan	-3.6192	104.9055	573.40	Not Certified	2023	-	audit in 2023, certificate will be issued in 2024
	Indonesia	KUD Sanjaya Citra Mandiri	Kab. OKI, Prov. Sumatera Selatan	-3.5147	104.9086	65.00	Not Certified	2025	-	
PT Sampoerna Agro	Indonesia	Mill Selapan Jaya	Desa Kerta Mukti, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7109	105.0975	118.595	Certified	2017	2017	
	Indonesia	Estate Hikmah Dua	Desa Pulau Geronggang, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.6557	105.1617	3,120	Certified	2017	2017	
	Indonesia	KUD Jadi Mandiri	Desa Embacang Permai, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7275	105.1186	579.81	Certified	2020	2020	
	Indonesia	KUD Maju Lancar	Desa Sedyo Mulyo, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.6524	105.0338	983.88	Certified	2018	2018	

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	Indonesia	KUD Madya Karya Bhakti	Desa Suka Sari, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7444	105.0248	1,011.88	Certified	2018	2018	
	Indonesia	KUD Sedya Mukti	Desa Gedung Rejo, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.6962	105.0522	1,068.90	Certified	2018	2018	
	Indonesia	KUD Jaya Makmur	Desa Bumi Makmur, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.6797	105.1006	1,436.07	Certified	2018	2018	
	Indonesia	KUD Bina Sejahtera	Desa Kerta Mukti, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7126	105.0778	1,122.62	Certified	2018	2018	
	Indonesia	KUD Bina Tani Mulya	Desa Maribaya, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.6577	105.1302	1,138.46	Certified	2018	2018	
	Indonesia	KUD Intan	Desa Panca Warna, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5250	105.1454	876.57	Certified	2018	2018	
	Indonesia	KUD Marga Mulya**	Desa Tanjung Makmur, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.9015	105.1060	593.16	Certified	2018	2018	
	Indonesia	KUD Sumber Sentosa	Desa Sumber Hidup, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5617	105.0717	1,199.85	Certified	2018	2018	
	Indonesia	KUD Serba Usaha	Desa Gading Raja, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5759	105.1037	1,216.58	Certified	2018	2018	
	Indonesia	KUD Ipoh Raya	Desa Kayu Labu, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5890	105.2143	1,000.95	Not Certified	2024	-	
	Indonesia	KUD Puger Mulya	Desa Pulau Geronggang, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.6435	105.2102	446.40	Not Certified	2024	-	
	Indonesia	KUD Harapan Jaya Mandiri	Desa Embacang, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.6993	105.1595	350.50	Not Certified	2024	-	
	Indonesia	KUD Balian Sejahtera Abadi	Desa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7442	105.1783	1,364.40	Not Certified	2024	-	
PT Sungai Rangit	Indonesia	Mill Sungai Rangit	Desa Kartamulya Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.6319	111.2554	-	Not Certified	2024	-	

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	Indonesia	Estate Baboti	Desa Sukaraja, Kec. Sukamara, Desa Sumber Mukti, Kec. Kota Waringin Lama, Kab. Kotawaringin Barat, Prov. Kalimantan Tengah	-2.5198	111.2788	2,411.81	Not Certified	2024	-	
	Indonesia	Estate Rauk Naga	Desa Babual Baboti & Desa Tempayung, Kec. Kotawaringin Lama, Kab. Kota Waringin Barat, Prov. Kalimantan Tengah	-2.5323	111.3387	2,349.56	Not Certified	2024	-	
	Indonesia	Estate Waringin	Desa Kartamulya, Desa Babual Baboti & Desa Tempayung, Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.5964	111.2743	3,039.66	Not Certified	2024	-	
	Indonesia	Estate Sukamara	Desa Kartamulya, Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.6384	111.2572	2,983.43	Not Certified	2024	-	
	Indonesia	Estate Telaga Bintang	Desa Pudu Rundun, Desa Natai Sedawa & Desa Kartamulya, Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.7142	111.2265	1,635.52	Not Certified	2024	-	
	Indonesia	Estate Sungai Sagu	Desa Kartamulya Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.5905	111.2316	3,120.90	Not Certified	2024	-	
	Indonesia	Estate Sahara	Desa Kartamulya Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.5913	111.3453	3,362.78	Not Certified	2024	-	
	Indonesia	Koperasi Pasir Subur Sampoerna	Kab. Sukamara, Prov. Kalimantan Tengah	-2.5743	111.3104	79.85	Not Certified	2025	-	
	Indonesia	Koperasi Sawit Mukti Jaya	Kab. Sukamara, Prov. Kalimantan Tengah	-2.5269	111.2255	740.97	Not Certified	2025	-	
	Indonesia	Koperasi Mulya Jaya	Kab. Sukamara, Prov. Kalimantan Tengah	-2.6851	111.2917	430.44	Not Certified	2025	-	
	Indonesia	Koperasi Patih Payung Sejahtera	Kab. Sukamara, Prov. Kalimantan Tengah	-2.5773	111.3042	458.60	Not Certified	2027	-	
	Indonesia	Kelompok Tani (PokTan) I s.d XXVIII	Kab. Sukamara, Prov. Kalimantan Tengah	-2.7087	111.2482	1,809.00	Not Certified	2026	-	

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	Indonesia	Kelompok Tani Mitra Terpadu I s.d III	Kab. Sukamara, Prov. Kalimantan Tengah	-2.6097	111.3055	884.15	Not Certified	2027	-	
	Indonesia	Koperasi Usaha Tani Sejahtera	Kab. Sukamara, Prov. Kalimantan Tengah	-2.5476	111.2149	55.56	Not Certified	2025	-	
PT Usaha Agro Indonesia	Indonesia	Mill Usaha Agro Indonesia	Desa Jambi, Kec. Manis Mata, Kab. Ketapang, Prov. Kalimantan Barat	-2.6824	110.9748	0	Certified	2021	2018	
	Indonesia	Estate Ulin Agro	Desa Jambi, Kec. Manis Mata, Kab. Ketapang, Prov. Kalimantan Barat.	-2.6320	111.0595	2,527.98	Certified	2021	2018	
	Indonesia	Estate Kruing Agro	Desa Jambi & Desa Danau Buntar, Kec. Manis Mata & Kendawangan, Kab. Ketapang, Prov. Kalimantan Barat.	-2,6500	110.9441	2,955.37	Certified	2021	2018	
	Indonesia	Estate Meranti Agro	Desa Danau Buntar, Kec. Kendawangan, Kab. Ketapang, Prov. Kalimantan Barat.	-2.6171	110.9412	4,187.10	Certified	2021	2018	
	Indonesia	Third location permit 2.283 ha	Kab. Ketapang, Prov. Kalimantan Barat.	-2.6522	111.0441	2,283	Not Certified	2025	-	
	Indonesia	Estate Gaharu Palm	Desa Suka Ramai, Kec. Manis Mata, Kab. Ketapang, Prov. Kalimantan Barat	-2.5777	111.0974	5,418	Not Certified	2025	-	
	Indonesia	Kopbun JMJS	Kab. Ketapang, Prov. Kalimantan Barat	-2.6522	111.0441	1,320.02	Certified	2021	2021	
	Indonesia	Kopbun SM	Kab. Ketapang, Prov. Kalimantan Barat	-2.5598	110.9455	901.95	Certified	2021	2021	
	Indonesia	Kopbun SB	Kab. Ketapang, Prov. Kalimantan Barat	-2.5610	110.9439	273.1100	Not Certified	2025	-	
	Indonesia	Gaharu Smallholder	Kab. Ketapang, Prov. Kalimantan Barat	-2.5887	111.0806	1,507.00	Not Certified	2027	-	
	Indonesia	Mill Lanang Agro Bersatu	Desa Istana, Kec. Sandai, Kab. Ketapang, Prov. Kalimantan Barat	-1.2113	110.5223		Not Certified	2024	-	
PT Lanang Agro Bersatu	Indonesia	Estate Bukit Subur	Desa Sandai Kiri, Penjawaan, Jago Bersatu, Kec. Sandai, Kab. Ketapang, Prov. Kalimantan Barat	-1.2493	110.4634	5,411.42	Not Certified	2024	-	

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	Indonesia	Estate Bukit Makmur	Desa Petai Patah, Demit, Kec. Sandai, Kab. Ketapang, Prov. Kalimantan Barat	-1.2339	110.6075	4,262.16	Not Certified	2024	-	
	Indonesia	Kopbun Bina Bersama	Kab. Ketapang, Prov. Kalimantan Barat	-1.2232	110.4541	618.76	Not Certified	2025	-	
	Indonesia	Kopbun Mitra Peruye Bersatu	Kab. Ketapang, Prov. Kalimantan Barat	-1.2070	110.5968	718.17	Not Certified	2025	-	
	Indonesia	Kopbun Dara Kaba	Kab. Ketapang, Prov. Kalimantan Barat	-1.1872	110.6733	199.06	Not Certified	2025	-	
Landak Area I	Indonesia	Estate Gunung Tenerah	1. Desa Songga, Desa Angkaras, Desa Berinang Mayun, Desa Sidan, dan Desa Lintah Betung (Kec. Menyuke) 2. Desa Semade, Desa Kampet, Desa Padang Pio, Desa Ringo Lojo dan Desa Untang (Kec. Banyuke Hulu) 3. Desa Tunang dan Desa Tiang Tanjung (Kec. Mempawah Hulu) 4. Desa Tahu (Kec. Meranti), Kab. Landak, Prov. Kalbar	0.6199	109.5812	3,127.58	Not Certified	2024	-	
	Indonesia	Estate Gunung Alam	1. Desa Songga, Desa Timbang Bale, Desa Lintah Betung, Desa Sidan, dan Desa Berinang Mayun (Kec. Menyuke) 2. Desa Padang Pio (Banyuke Hulu) 3. Desa Kayu Ara, Desa Kelampai Stolo, Desa Muara Betung (Kec. Meranti), Kab. Landak, Prov. Kalbar	0.6677	109.5935	3,245.35	Certified	2024	-	
	Indonesia	Estate Kedurang Prakarsa Nabati	Kec. Menyuke, Banyuke Hulu, Meranti & Mempawah, Kab. Bengkayang, Prov. Kalimantan Barat	0.7680	109.6079	3,319.00	Not Certified	2024	-	
	Indonesia	Kopbun Usaha Ane Laki	Kab. Landak, Prov. Kalimantan Barat	0.6014	109.5673	276.15	Not Certified	2026	-	

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	Indonesia	Kopbun Usaha Tandan Hidup	Kab. Landak, Prov. Kalimantan Barat	0.7257	109.6123	523.49	Not Certified	2026	-	
	Indonesia	Kopbun Biki Diri Maju	Kab. Landak, Prov. Kalimantan Barat	0.6788	109.5792	607.62	Not Certified	2026	-	
	Indonesia	Kopbun Panamukng Sagauh Raya	Kab. Landak, Prov. Kalimantan Barat	0.6158	109.7035	296.06	Not Certified	2026	-	
	Indonesia	PT. Kedurang Prakarsa Nabati Smallholders	Kab. Bengkayang, Prov. Kalimantan Barat	0.7748	109.6068	450.00	Not Certified	2026	-	
Landak Area II	Indonesia	Estate Gunung Sejahtera	Desa Kuala Behe, Paku Raya, Sumedang, Nyanyum, Kec. Kuala behe, Kab. Landak, Prov. Kalimantan Barat	0.5768	110.0506	1,655.00	Not Certified	2025	-	
	Indonesia	Estate Gunung Mentari	1. Desa Serimbu, Jambu Tembawang, Sepangah, Engkadi Pede dan Temoyok, Kec. Air Besar 2. Desa Semedang & Permit, Kec. Kuala Behe Kab. Landak, Prov. Kalimantan Barat	0.7322	110.0936	951.26	Not Certified	2025	-	
	Indonesia	Estate Gunung Utama	1. Desa Serimbu, Jambu tembawang, Sepangah, Engkadi pede dan Temoyok, Kec. Air Besar 2. Desa Semedang & Permit, Kec. Kuala behe Kab. Landak, Prov. Kalimantan Barat	0.6903	110.1053	896.49	Not Certified	2025	-	
	Indonesia	Kopbun Sawit Ene Mampui Sejahtera	Kab. Landak, Prov. Kalimantan Barat	0.5833	110.0423	521.64	Not Certified	2027	-	
	Indonesia	Kopbun Binua Aek' Ayak	Kab. Landak, Prov. Kalimantan Barat	0.7250	110.0667	253.65	Not Certified	2027	-	
	Indonesia	Kopbun Saripan Ayunkg Apu	Kab. Landak, Prov. Kalimantan Barat	0.6472	110.0770	223.35	Not Certified	2027	-	

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 eight (8) Critical; five (5) Minor nonconformities and zero (0) Opportunity For Improvement raised. The PT Usaha Agro Indonesia 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 #	2470310-202403-M1	Issued Date	23/03/2024
Due Date	22/06/2024	Closure Date	22/05/2024
Indicator & Category (Critical / Minor)	2.1.2 Recurring Minor - Escalated to Critical		
Statement of Nonconformity:	The company has not been able to show sufficient evidence that it has an effective documented system to ensure legal compliance of all contracted third parties.		
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:	<p>The company demonstrated an <i>Evaluasi Pemenuhan UU dan Peraturan K3, Lingkungan, Perkebunan dan Syarat Lainnya</i> for Mill and Estate on 21 July 2023. The results of this evaluation showed that there were regulations and laws that were declared not fulfilled, for example (but not limited to):</p> <ul style="list-style-type: none"> PT.UAI's P2K3 structure is in the process of being ratified by the Manpower and Transmigration Office of Ketapang Regency according to letter No./PT.UAI-EXT/PP/VI/2023 and the <i>SKP</i> for the Appointment of OHS Experts has expired on 29 January 2024. First aid officers have not received first aid training and certification from the relevant agencies. Clinic Operational Permit at PT UAI from <i>DPMPTSP</i> Ketapang Regency No. 017/DPMPTSP-D/2018 dated 15 January 2018 has expired as of 15 January 2023. Testing and/or calibration of medical devices has not been carried out regularly at least once a year. <p>And from the results of field visits at Mill and interviews with workers, it is known that sterilizer operators, engine room operators, electrical operators, wheel loader operators, welders and waste operators do not yet have OHS licenses and competency certificates. Furthermore, based on the verification of the <i>Posisi Tenaga Kerja PKS</i> document as of 01 February 2024 which is shown, with the</p>		

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	<p>following information: 2 sterilizer operators, 2 boiler operators, 1 engine room operator, 1 electrical engineer, 2 heavy equipment operators, 2 welders, and 2 waste operators.</p> <p>In relation to the information above, the company further shows the following:</p> <ul style="list-style-type: none"> • Certificate Number 5/1402091222/AS.01.04/XII/2022 dated 09 December 2022 in the name of Sandi (Class I Operator). • Certificate Number 563/13/UPT.LKI-3 dated 30 December 2019 in the name of Yusuf Subagio (SMAW 3G Welder) • Certificate Number 14066/OPK3/PAA-LT/X/2017 dated 06 October 2017 in the name of Revi Susanto (wheel loader operator), has expired. <p>Referring to applicable laws and regulations, there are personal requirements that must have an OHS license and competency certificate, for example (but not limited to):</p> <ul style="list-style-type: none"> - <i>Permenaker No. 01 Tahun 1988 Kualifikasi dan Syarat - Syarat Operator Pesawat Uap</i> - <i>Permenaker No. 38 Tahun 2016 K3 Pesawat Tenaga dan Produksi</i> - <i>Permenaker No. 12 Tahun 2015 K3 Listrik di Tempat Kerja & Permenaker No. 33 Tahun 2015 Perubahan atas Permenaker No. 12 Tahun 2015 K3 Listrik di Tempat Kerja</i> - <i>Permenakertrans No. 09 Tahun 2010 Operator dan Petugas Pesawat Angkat Angkut</i> - <i>Permenakertrans No. 02 Tahun 1982 Kwalifikasi Juru Las</i> - <i>PerMenLHK No. 05 Tahun 2018 Standar dan Sertifikasi Kompetensi Penanggung Jawab Operasional Pengolahan Air Limbah dan Penanggung Jawab Pengendalian Pencemaran Air</i> - <i>PerMenLHK No. 06 Tahun 2018 Standar dan Sertifikasi Kompetensi Penanggung Jawab Operasional Instalasi Pengendalian Pencemaran Udara dan Penanggung Jawab Pengendalian Pencemaran Udara</i> - <i>PerMenLHK No. 06 Tahun 2021 tentang Tata Cara Pengelolaan Limbah B3</i> <p>Based on the explanation above, the Company has not been able to show sufficient evidence that the company has a documented system to ensure legal compliance is fulfilled and has been followed up.</p>
<p>Corrections:</p>	<ul style="list-style-type: none"> • Unit Estate and Mill create a work program to fulfill the rules and regulations and other requirements in accordance with the P-SAG-HO-SUS-06 procedure regarding laws and other requirements. • Unit Estate and Mill carry out and fulfill work programs to fulfill regulations and laws and other requirements in accordance with the P-SAG-HO-SUS-06 procedure regarding laws and other requirements. <p>Verified during NCR Close Out Visit:</p>

	<p>Work Program to Fulfill Regulations and Legislation and other related requirements that have not been met for MAE, KAE, UAE and Cooperative units, for example:</p> <ul style="list-style-type: none"> • The P2K3 structure is still in the process of being approved by the Manpower Office of Ketapang Regency, the deadline for completion is July 2024. • Training and certification of first aid officers, planned for August 2024 • Submission of medical equipment calibration, deadline for completion October 2024. • Follow-up on processing of clinic permit extension, deadline for completion is December 2024. <p>Letter Number 02/PT UAI-EXT/PP/V/2024 dated 13 May 2024 regarding application for extension of SKP and OHS Expert License in the name of Nurcahyo Adhi Saputro addressed to the Director of PNK3, Directorate General of Labor Inspection Development, Ministry of Manpower and Transmigration of the Republic of Indonesia.</p> <p>Email from PT Centra Artha Prima Indonesia dated 18 May 2024 regarding the application for an extension of the SKP OHS Expert on behalf of Nurcahyo Adhi Saputro.</p> <p>Letter Number 01/PT UAI-EXT/PP/IV/2024 dated 16 April 2024 regarding the request for ratification of the composition of PT UAI's P2K3 management which was addressed to the Manpower and Transmigration Agency of Ketapang Regency.</p> <p>Letter Number 0089/S-Pen-SER.FGM/MKTG/V/2024 dated 17 May 2024 issued by PT Fresh Galang Mandiri regarding confirmation of registration for certification training on behalf of:</p> <ul style="list-style-type: none"> • Fransisko Karinda class 1 boiler operator training • Joni Iskandar (sterilizer operator) class 1 boiler operator training • Widodo (engine room operator) generator prime mover operator training • Antoni (electrical) electrical K3 technician training • Rohmat Sodik (welder) SMAW Class 1 welder training <p><i>Pesawat Angkat dan Angkut</i> Certification Registration Form with PJK3 (SMART TRAINING & CONSULTANT) on 24 April 2024</p> <ul style="list-style-type: none"> • OHS Wheel Loader Operator Certification in the name of Andika • OHS Wheel Loader Operator Certification in the name of Sawaludin Ramadansyah • OHS Dump Truck Operator Certification on behalf of Kusmono <p>Inhouse Training Proposal (No. 070/PTSI/QT/IV/2024) for OHS Certification Training for Heavy Equipment Operators, Indonesian Ministry of Manpower submitted by SMART TRAINING & CONSULTANT.</p> <p>Operational Responsibility Competency Certificate No. 37000 3132.05 00016107 2024 dated 28 March 2024 in the name of Tomi Lapisa.</p>
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Root Cause Analysis:	The company has carried out a regulatory evaluation according to the P-SAG-HO-SUS-06 procedure regarding laws and other requirements in July 2023. However, the PIC who is responsible for this case the plantation and factory units has not yet created a work program to fulfill regulations and laws and other requirements because it has not yet been implemented. understand the procedure.
Corrective Actions:	<p>Conduct socialization to all unit Estate and Mill regarding procedure laws and other requirements (P-SAG-HO-SUS-06).</p> <p>Verified during NCR Close Out Visit:</p> <p>Report on socialization of identification and evaluation procedures for legal regulations and other requirements (P-SAG-HO-SUS-06) dated 16 May 2024.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate correction and corrective action. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2470310-202403-M2	Issued Date	23/03/2024
Due Date	22/06/2024	Closure Date	22/05/2024
Indicator & Category (Critical / Minor)	3.6.1 Recurring Critical		
Statement of Nonconformity:	Not all activities within the scope of the Mill and Estate of PT Usaha Agro Indonesia have been risk analyzed..		
Requirement Reference:	All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>The company shows the <i>Form Analisa Risiko Operasional (ORM), Aspek Mutu, Lingkungan dan K3</i> (Doc. No. FM-SAG-HO-SU-070004, Rev.2, 01 July 2021) for KAE, UAE and MAE units made by OHS Experts, checked by the Head of the Work Unit, and approved by MR on 22 January 2024. Based on the verification results, it is known that there are estate operational activities for which hazard identification and risk assessment have not been carried out, for example (but not limited to):</p> <ul style="list-style-type: none"> • Fertilizer storage • Fuel tank • Mixing pesticide • <i>Tim Unit Semprot</i> (tank and transportation of worker) • Land Application • Hazardous waste storage • Emplacement/employee housing • Use of heavy equipment and vehicles 		

	<p><i>Form Analisa Risiko Operasional (ORM), Aspek Mutu, Lingkungan dan K3</i> (Doc. No. FM-SAG-HO-SU-070004, Rev.2, 01 July 2021) for Mill made by OHS Experts, checked by the Head of the Work Unit, and approved by MR on 31 January 2024. Based on the verification results, it is known that there are mill operational activities for which hazard identification and risk assessment have not been carried out, for example (but not limited to):</p> <ul style="list-style-type: none"> • Security • Cleaning tank • Emplacement/employee housing <p>Based on the results of a field visit to the spray work at KAE, it is known:</p> <ul style="list-style-type: none"> • Spray workers use Dump Trucks for transportation to land areas. • The tank used for mixing uses a fire truck, due to TUS vehicle is damage condition. • When mixing chemicals there is no base so there is potential for spills and leakage. • Safety Data Sheet no available. <p>From field observations at the Material Warehouse at Mill, it is known that the chemical storage area does not have emergency spill response equipment. Apart from that, there are pressure vessel tubes that are untied.</p> <p>Based on the explanation above, not all activities within the scope of the Mill and Estate of PT Usaha Agro Indonesia have been risk analyzed.</p>
<p>Corrections:</p>	<p>The company revised the results of the Operational Risk Analysis (ORM), Quality, Environmental and OHS Aspects (Doc. No. FM-SAG-HO-SU-070004, Rev.2, 01 July 2021) and completed all activities according to existing procedures and carried out identification towards all activities or new activities within the scope of the company based on the location of important (high risk) activities.</p> <p>Verified during NCR Close Out Visit:</p> <ul style="list-style-type: none"> • Operational Risk Analysis Form (ORM), Quality, Environmental and K3 Aspects (Doc. No. FM-SAG-HO-SU-070004, Rev.2, 01 July 2021) made by OHS Expert, checked by the Head of the Work Unit, and approved by Management Representative on 22 April 2024 (UAE), 20 April 2024 (MAE), and 19 April 2024 (KAE), 01 April 2024 (UAI POM). ORM has been reviewed and added, for example, tank washing activities at POM, waste management at factories, recording vehicles entering POM. • Follow-up report at the Warehouse POM has provided emergency spill response equipment and relocation of pressure vessel tubes equipped with chains. • Report of Service Unit Work DT D667 (TUS vehicle).

	<ul style="list-style-type: none"> The results of interviews with the foreman and spraying workers are submitted for the base when the mixing is available and the LDKB is brought by the foreman.
Root Cause Analysis:	The company has created an Operational Risk Analysis Form (ORM), Quality, Environmental and OHS Aspects (Doc. No. FM-SAG-HO-SU-070004, Rev.2, 01 July 2021) but it is made based on flow-procedures or procedural stages, not based on the location of activities for all plantations and mills.
Corrective Actions:	<ul style="list-style-type: none"> Review the results of the Operational Risk Analysis (ORM), Quality, Environmental and OHS Aspects, which covers all activities in the estate and mill areas. Socialize the P-SAG-HO-SUS-07 procedure regarding Integrated Management System Risk Management to all estate and mill work units. <p>Verified during NCR Close Out Visit:</p> <ul style="list-style-type: none"> Minutes of the socialization of quality, environment and OHS identification (ORM) on 15 April 2024 which was attended by the Head and warehouse workers of UAI POM. Minutes of the socialization of quality, environment and OHS identification (ORM) on 13 May 2024 which was attended by harvester and up keep workers from Divisions 1, 2, 3 and 4 UAE. Minutes of the socialization of quality, environment and OHS identification (ORM) on 18 April 2024 which was attended by MAE Division 1 harvester and up keep workers. Minutes of the socialization of quality, environment and OHS identification (ORM) on 02 May 2024 which was attended by MAE Division 2 harvester and up keep workers. Minutes of the socialization of quality, environment and OHS identification (ORM) on 05 May 2024 which was attended by MAE Division 1 manuring workers. Minutes of the socialization of quality, environment and OHS identification (ORM) on March 30 2024 which was attended by MAE Division 3 spraying workers. Minutes of the socialization of quality, environment and OHS identification (ORM) on 03 May 2024 which was attended by harvester and up keep workers of Division 1 MAE. Minutes of the socialization of quality, environment and OHS identification (ORM) on 03 May 2024 which was attended by KAE harvester and up keep workers.
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate correction and corrective action. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2470310-202403-M3	Issued Date	23/03/2024
Due Date	22/06/2024	Closure Date	22/05/2024
Indicator & Category (Critical / Minor)	3.8.9 Critical		
Statement of Nonconformity:	There is no evidence that UAI mill has 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.		
Requirement Reference:	<p>Outsourcing Activities</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>		
Objective Evidence:	<p>UAI Mill has outsourced the transportation activity for CPO and PK to contractor as below:</p> <ul style="list-style-type: none"> CV Karya Mandiri Sejati, Agreement contract "Perjanjian Jasa Pengangkutan CPO Nomor: 051/X/COM/EX/2014" dated 13 Oct 2014 and "Adendum Ketiga No. 0228/XII/COM/EX/2019" dated 31 December 2019 – Contract for CPO transport PT Jangkar Prima Sejati, Agreement contract "Perjanjian Jasa Pengangkutan Palm Kernel Nomor: 020/I/COM/EX/2019" dated 17 Jan 2019. <p>According to contract agreement it was noted that there is no information that UAI mill has ensure 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>No other evident of statement or information that UAI mill has ensure 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>		
Corrections:	<p>Make an addendum to the agreement with contractors or independent third parties by adding an article stating that the contractors or independent third parties involved provide relevant access for accredited CBs to their respective operations, systems and all information.</p> <p>Verified during NCR Close Out Visit:</p> <p>CPO Transportation Services Agreement Number 067/IV/COM/EX/2024 dated 05 April 2024 between PT UAI and CV Karya Mandiri Sejahtera, with a validity period of the agreement until 31 December 2024.</p> <p>PK Transportation Services Agreement Number 068/IV/COM/EX/2024 dated 05 April 2024 between PT UAI and PT Jangkar Prima Sejati, with a validity period of the agreement until 31 December 2024.</p>		

	In the Agreement, it has been added regarding the contractor providing access to the certification body regarding the contractor's operations, systems and information. Apart from that, contractors can also carry out internal audits by the sustainability team and external audit team appointed by the Company
Root Cause Analysis:	Personnel responsible for creating agreement for CPO and PK transport contractors do not understand the requirements of P&C RSPO indicator 3.8.9 point d regarding POM must ensure (for example through contracts) that independent third parties involved can provide appropriate access to accredited CBs in order to access operations and their respective systems, along with any information they have, if the audit is notified in advance.
Corrective Actions:	<p>Conduct socialization to personnel responsible for creating agreement for CPO and PK transport contractors regarding RSPO P&C requirements indicator 3.8.9 point in POM is obliged to ensure (for example through contracts) that independent third parties involved can provide appropriate access to accredited CBs so that they can access their respective operations and systems, along with any information they have, if the audit is notified in advance.</p> <p>Verified during NCR Close Out Visit:</p> <p>Minutes of the socialization of making contractor agreement in accordance with the P&C RSPO indicator 3.8.9 requirements which was held on 17 May 2024 and attended by the Commercial Senior Manager, Commercial Manager, Head of Administration POM and the Sustainability team.</p> <p>The results of an interview with CV Karya Mandiri Sejahtera (Rudi) revealed that there was an addendum to the cooperation agreement in April 2024 regarding additional provisions regarding providing access or information if required by the Certification Body. And it was confirmed that the company had conveyed information to contractors regarding this matter</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate correction and corrective action. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2470310-202403-M4	Issued Date	23/03/2024
Due Date	22/06/2024	Closure Date	22/05/2024
Indicator & Category (Critical / Minor)	4.4.3 Critical		
Statement of Nonconformity:	The company has not been able to show evidence showing that legal rights, customary rights or use rights have been participatory mapping involving the affected parties (surrounding communities).		
Requirement Reference:	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).		

Objective Evidence:	<p>Based on the results of a field visit to HCV the Paya Tarum Riparian, Block D.033 MAE, an area was found that had been designated as an HCV, but was claimed by the local community.</p> <p>Interviews were conducted with representatives of Danau Buntar Village and Jambi Village, it was confirmed that there was community-owned land included in the PT UAI <i>HGU</i> (land title) area. The community claims that the community was not included/involved in mapping the HGU boundaries</p>
Corrections:	<ul style="list-style-type: none"> • Attach participatory mapping documents for communities affected by plantation development (HGU acquisition) for the Danau Buntar and Jambi Village communities in accordance with procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh (P-SAG-HO-CA&L-03) and procedure Penanganan Klaim dan Sengketa Lahan (P-SAG-HO-CA&L-09). • The company has provided planting compensation to the community in the HCV area through a participatory mapping process in accordance with the land ownership of the previous company. <p>Verified during NCR Close Out Visit:</p> <p>Integrated Management System Procedur Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh No. P.SAG-HO-CA&L-03 dated 01 November 2019 (Rev.04).</p> <p>Integrated Management System Procedur Penanganan Klaim dan Sengketa Lahan No. P.SAG-HO-CA&L-09 dated 01 September 2017 (Rev.01).</p> <p><i>Ganti Rugi Tanam Tumbuh (GRTT)</i> in the name of Abun/Cawang, MAE block D33-34 location covering an area of 2.58 Ha</p> <ul style="list-style-type: none"> - Statement and Consent Letter from Husband/Wife/Family signed by the person concerned and the witnesses. - Letter of Acknowledgment of Rights issued by the Head of Danau Buntar Village - Certificate of Land Rights issued by the Head of Kendawangan District - Minutes of Measurement of Owned/Cultivated Land - Status of land and plantings submitted, with a total of 220 small trees. - Statement of Relinquishment of Land Rights No. 127/SPPH-GRTT/UAI/XI/2012 dated 16 November 2012 which was signed by the land owner, the Company and acknowledged by the Head of Kendawangan District. - Statement and Guarantee Letter signed by the land owner and acknowledged by the Village Head on November 16 2012. - Minutes of land handover and planting number 127/BAST-GRTT/UAI/XI/2012 dated 16 November 2012, with a total area of 2.58 Ha and a total GRTT of Rp. 3,103,000. The Minutes are signed by the land owner and the Company, and accompanied by a stamp. - Planting Growth Compensation Map, payment in November 2012 with one location in Block D33-34. - Photo documentation of GRTT payments in the name of Abun/Cawang.

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Root Cause Analysis:	The company has fulfilled legal rights, customary rights or use rights by carrying out participatory mapping of communities affected by plantation development (HGU acquisition) in accordance with procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh (P-SAG-HO-CA&L-03) and procedure Penanganan Klaim dan Sengketa Lahan (P-SAG-HO-CA&L-09) but access to these documents must go through the company's legal team.
Corrective Actions:	Conduct socialization to communities affected by plantation development (HGU acquisition) regarding the procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh (P-SAG-HO-CA&L-03) and procedure Penanganan Klaim dan Sengketa Lahan (P-SAG-HO-CA&L-09).
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate correction and corrective action. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2470310-202403-M5	Issued Date	23/03/2024
Due Date	22/06/2024	Closure Date	22/05/2024
Indicator & Category (Critical / Minor)	5.2.2 Recurring Minor - Escalated to Critical		
Statement of Nonconformity:	PT Usaha Agro Indonesia has not demonstrated a capacity building program for plasma/smallholders		
Requirement Reference:	The unit of certification has not 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).		
Objective Evidence:	<p>It was confirmed during interview with the management of the Koperasi Jambi Mekar Jaya Sempurna and Koperasi Perkebunan Sempuran Bersatu and Koperasi Perkebunan Sempurna Mandiri, stated that there were no programs and training provided to Plasma for institutional improvement, Agronomy, K3, FPIC, RSPO and other aspects.</p> <p>Based on a review of documents, the company was also unable to demonstrate a training program for Scheme Smallholder.</p>		
Corrections:	<ul style="list-style-type: none"> Create a training program in 2024 for cooperative administrators and farmer representatives related to cooperative institutions, agronomy, OHS, FPIC, RSPO and other aspects. Carrying out training for cooperative administrators and farmer representatives related to cooperative institutions, agronomy, OHS, FPIC, RSPO and other aspects. <p>Verified during NCR Close Out Visit:</p> <p>The Company Partner Cooperative Management Training Plan period 2024 prepared by the Partnership Assistant and approved by the PT UAI Partnership GM and PT UAI GM, includes:</p>		

	<ul style="list-style-type: none"> - May 2024 Harvesting Technical Training - June 2024 Up Keep Technical Training - July 2024 Manuring Technical Training - August 2024 Agronomy Administration Training - September 2024 Socialization of RSPO Principles and Criteria - October 2024 OHS Socialization - November 2024 cooperative administration training with organizer Diskoperindag Ketapang Regency - December 2024 KarHutLa training with organizer Manggala Agni Ketapang <p>Realization of training, for example the Harvest Training on 18 May 2024, which was attended by administrators and members of JMJS, Koperasi Sempurna Bersatu and Koperasi Sempurna Mandiri e. The training aims to ensure that plasma cooperative administrators and farmers understand the mechanisms of harvest work in accordance with applicable SOPs.</p>
Root Cause Analysis:	<p>The company has not yet created a training or coaching program for cooperative administrators and farmer representatives related to cooperative institutions, agronomy, OHS, FPIC, RSPO and other aspects in 2024, because the type of training, time and place for implementation has not been determined and planned as soon as possible.</p>
Corrective Actions:	<ul style="list-style-type: none"> • Disseminate training or coaching programs to cooperative administrators and farmer representatives related to cooperative institutions, agronomy, OHS, FPIC, RSPO and other aspects. • Monitoring and evaluating training or coaching programs for cooperative administrators and farmer representatives. <p>Verified during NCR Close Out Visit:</p> <p>Minutes meeting dated 18 May 2024, socialization of training programs related to smallholders, agronomy, OHS, RSPO and other aspects to cooperative administrators.</p> <p>Training Evaluation (FM-SAG-HO-HR-020003) date 18 May 2024. In the evaluation, the feedback from the training attended by the management and members of the cooperative is explained. In general, in the evaluation, it is stated that the training was felt to be beneficial for the management and members of the cooperative.</p> <p>The results of interviews with JMJS cooperative administrators revealed that the company had carried out harvest training for cooperative administrators</p>
Assessment Conclusion:	<p>PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate correction and corrective action. The Major NC closed satisfactorily.</p>

Non-conformity			
NCR Ref #	2470310-202403-M6	Issued Date	23/03/2024
Due Date	22/06/2024	Closure Date	22/05/2024
Indicator & Category (Critical / Minor)	6.2.2 Recurring Critical		
Statement of Nonconformity:	There is a worker with the status of PKWT/KHL but have not gotten compensation in accordance with the PP No. 35 years 2021.		
Requirement Reference:	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.		
Objective Evidence:	<p>PP 35 of 2021</p> <p>Article 15 providing compensation.</p> <p>(1) Employers are obliged to provide compensation money to Workers/Labourers whose employment relationship is based on <i>PKWT</i>.</p> <p>(2) The compensation money is given at the end of the <i>PKWT</i>.</p> <p>(3) Compensation money as intended in paragraph (1) is given to Workers/Labourers who have worked for at least 1 (one) month continuously.</p> <p>(4) If the <i>PKWT</i> is extended, compensation money is given at the end of the <i>PKWT</i> period before the extension and for the <i>PKWT</i> extension period, the next compensation money is given after the extension of the <i>PKWT</i> period ends or is completed.</p> <p>(5) The provision of compensation money does not apply to foreign workers employed by employers in Employment Relations based on <i>PKWT</i>.</p> <p>Article 16: Amount of compensation money;</p> <p>1. The amount of compensation money is given in accordance with the following provisions:</p> <p>a) <i>PKWT</i> for 12 (twelve) months continuously, given 1 (one) month's wages;</p> <p>b) <i>PKWT</i> for 1 (one) month or more but less than 12 (twelve) months, calculated proportionally by calculating: work period/12) x 1 (one) month Wages;</p> <p>c) <i>PKWT</i> for more than 12 (twelve) months, calculated proportionally with the calculation: (work period/12) x 1 (one) month Wage.</p> <p>Based on interviews on field trips to scratch your job disc manual block C.29 in Mae Afdeling 3, that there is a <i>PKWT</i> worker who doesn't get compensation according to the pp No. 35 years 2021.</p> <p>Workers on behalf of Meli*** who have worked for 3 years (from 2021) and have done an extension of the employment contract in 2022, but have not gotten compensation in accordance with the PP No. 35 years 2021.</p>		

	<p>Based on interviews with KTU, that there is no compensation payment to PKWT/KHL workers after the contract workers agreement is over.</p> <p>PT UAI has issued a Memorandum through GM PT UAI No. 001/GM-UAI/III/2024 dated 21 March 21 regarding the Provision of Compensation to PKWT Workers, contains:</p> <ul style="list-style-type: none"> Employers are obliged to provide compensation money to workers/laborers whose employment relationship is based on PKWT. Compensation is given at the end of the PKWT. <p>However, the company has not yet identified the number of employees who are entitled to compensation in accordance with PP 35/2021.</p> <p>Based on explanation above, there is a worker with the status of PKWT/KHL who has ended of contract it works (for 2 years) but have not gotten compensation in accordance with the PP No. 35 years 2021.</p>
Corrections:	<ul style="list-style-type: none"> Create a mechanism for paying compensation to workers with PKWT status in accordance with PP No. 35 of 2021. Identify the number of employees/workers who are entitled to compensation in accordance with PP No. 35 of 2021. Make compensation payments to workers with PKWT status in accordance with company mechanisms based on the number of employees/workers who are entitled to receive compensation <p>Verified during NCR Close Out Visit:</p> <p>MAE</p> <ul style="list-style-type: none"> List of PKWT workers MAE for the period April 2024 is 285 workers. List of 20 PKWT workers MAE receiving PKWT compensation, document made by Head of Administration and known to Estate Manager dated 16 May 2024. Memorandum Number 0014/MAE/V/2024 dated 02 May 2024 regarding requests for compensation payments for 20 PKWT workers MAE <p>KAE</p> <ul style="list-style-type: none"> List of PKWT workers KAE for the period April 2024 is 226 workers. List of 29 PKWT workers KAE receiving PKWT compensation, document made by Head of Administration and known to Estate Manager dated 16 May 2024. Memorandum Number 010/KAE/V/2024 dated 15 May 2024 regarding requests for compensation payments for 29 PKWT workers KAE <p>UAE</p> <ul style="list-style-type: none"> List of PKWT workers UAE for the period April 2024 is 317 workers. List of 26 PKWT workers UAE receiving PKWT compensation, document made by Head of Administration and known to Estate Manager dated 16 May 2024. Memorandum Number 005/UAE/V/2024 dated 20 May 2024 regarding requests for compensation payments for 26 PKWT workers UAE

	The company shows evidence of payment (<i>kwitansi</i>) of PKWT compensation, for example MAE in the names of Alesandro Delpiero Anabokay (Up Keep workers), Meliyani (Chemist Division 4), Jhon Simenes (Up Keep workers).
Root Cause Analysis:	There is no mechanism yet available for payment of compensation to workers with PKWT status in accordance with PP No. 35 of 2021
Corrective Actions:	<ul style="list-style-type: none"> Conduct socialization to estate and mill work units regarding the compensation payment mechanism for workers with PKWT status in accordance with PP No. 35 of 2021 Conduct socialization to all workers regarding the compensation payment mechanism for workers with PKWT status in accordance with PP No. 35 of 2021 <p>Verified during NCR Close Out Visit: Minutes meeting of 6 May 2024 socialization of procedures and mechanisms for PKWT compensation payments delivered by HR to employees of UAE, KAE and MAE work units.</p> <p>Interviews with PKWT workers MAE (Division Clerk and Up Keep workers) revealed that the workers were aware of the provision of PKWT compensation for workers whose work agreements had expired and or whose work agreements had been extended.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate correction and corrective action. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2470310-202403-M7	Issued Date	23/03/2024
Due Date	22/06/2024	Closure Date	22/05/2024
Indicator & Category (Critical / Minor)	6.7.4 Recurring Minor – Escalated to Critical		
Statement of Nonconformity:	The company has not been able to show sufficient evidence that it has registered BPJS Employment and BPJS Health for all workers.		
Requirement Reference:	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.		
Objective Evidence:	<p>The company shows the records/documents:</p> <ul style="list-style-type: none"> Tagihan 02620110202402 (<i>BPJS Kesehatan</i> KAE) with 181 participants Tagihan 02620107202402 (<i>BPJS Kesehatan</i> MAE) with 99 participants Tagihan 02620108202402 (<i>BPJS Kesehatan</i> UAE) with 231 participants 		

	<ul style="list-style-type: none"> • <i>Rincian Iuran Ketenagakerjaan BPJS Ketenagakerjaan</i> KAE for February 2024, with a total membership of 12 PB, 219 KHT, 239 KHL. • <i>Rincian Iuran Ketenagakerjaan BPJS Ketenagakerjaan</i> MAE for February 2024, with a total membership of 4 PB, 141 KHT, 4 KHL. • <i>Rincian Iuran Ketenagakerjaan BPJS Ketenagakerjaan</i> UAE for February 2024, with a total membership of 3 PB, 103 KHT, 5 contracts. <p>The results of field visits and interviews with own estates and scheme smallholders workers with PKWT/KHL status, stated that workers had not been registered for <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>.</p>
Corrections:	<ul style="list-style-type: none"> • Identify the names of employees who have not registered with BPJS Ketenagakerjaan dan BPJS Kesehatan. • Conduct socialization to employees regarding BPJS Kesehatan. • Encourage and facilitate employees who have the status of PBI Jamkesda recipients to carry out the BPJS membership migration process. • Register the names of employees who have not registered with BPJS Ketenagakerjaan dan BPJS Kesehatan according to the identification results. <p>Verified during NCR Close Out Visit:</p> <p>List of employees not yet registered with BPJS Kesehatan:</p> <ul style="list-style-type: none"> - KAE: 94 workers - MAE: 344 workers - UAE : 308 workers <p>List of employees not yet registered with BPJS Ketenagakerjaan:</p> <ul style="list-style-type: none"> - KAE: 36 workers - MAE: 292 workers - UAE : 294 workers <p>The BPJS Ketenagakerjaan Membership Registration Program was created on 20 May 2024, with a deadline of July 2024.</p> <p>The results of the interview with PKWT MAE (upkeep workers and divisional clerk) stated that the company had conveyed information that PKWT workers would be registered with BPJS Ketenagakerjaan and BPJS Kesehatan.</p>
Root Cause Analysis:	<p>The company has registered BPJS Ketenagakerjaan and BPJS Kesehatan for employees but does not cover all employees because;</p> <ul style="list-style-type: none"> • The employee's complete population documents already exist but have not been registered with <i>Dukcapil</i>. (Not Valid) • There are still employees registered with the government's BPJS Kesehatan (PBI Jamkesda) so membership migration must be carried out by the

	employees themselves. Some employees are also unwilling to migrate their BPJS.
Corrective Actions:	<ul style="list-style-type: none"> Monitoring employees who are in the process of fulfilling complete population documents. Conduct and submit evaluations of the names of employees who have not registered with BPJS Ketenagakerjaan and BPJS Kesehatan. <p>Verified during NCR Close Out Visit: The company shown record of Registration Progress of BPJS Ketenagakerjaan and BPJS Kesehatan for all workers of UAE, MAE, and KAE.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate correction and corrective action. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2470310-202403-M8	Issued Date	23/03/2024
Due Date	22/06/2024	Closure Date	22/05/2024
Indicator & Category (Critical / Minor)	7.12.4 Critical		
Statement of Nonconformity:	The company cannot show evidence that all HCV management plan recommendations have been implemented.		
Requirement Reference:	Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).		
Objective Evidence:	<p>Recommendations for the HCV management plan based on the PT Usaha Agro Indonesia HCV Study Report and the PT Usaha Agro Indonesia KBKT Management and Monitoring Report implemented by the company are:</p> <ol style="list-style-type: none"> 1. Land cover monitoring is carried out every year. 2. Socialize High Conservation Value, High Carbon Stock and Areas. 3. Marking of High Conservation Value and High Carbon Value Areas. 4. In carrying out the Inventory of Natural Flora and Vegetation, it is necessary to create a Permanent Sample Plot. 5. In order to improve the ecosystem of High Conservation Value Areas, revegetation activities need to be carried out. 		

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	<p>Based on field visits at the HCV Borders of the Danau Kapar River, KAE and the Borders of the Paya Tarung River, MAE, where the land cover is bushes, no revegetation activities (plant enrichment) were found.</p> <p>Based on a field visit at the Jambi River Border HCV in the UAE, it was found that the HCV sign board was in a rotten condition.</p>
Corrections:	<p>Implementing HCV management plan recommendations based on PT Usaha Agro Indonesia's HCV Study Report which have not yet been realized, such as:</p> <ul style="list-style-type: none"> Carrying out revegetation activities on the Danau Kapar River Riparian, KAE and the Paya Tarung River Riparian, MAE Repairing HCV signage at the Jambi River Riparian in the UAE. <p>Verified during NCR Close Out Visit:</p> <p>Minutes dated 4 May 2024 on revegetation/plant enrichment activities at HCV on the Kapar River riparian located in Blocks N22 and O22 Division 2 KAE. The types of trees planted include 76 Meranti trees, 1 mango tree, 1 guava tree. The report is equipped with photo documentation before, during and after the planting activity.</p> <p>Minutes dated 18 May 2024 of revegetation/plant enrichment activities at KBKT/HCV Paya Tarung River Riparian located in Block ID0035 Division 3 MAE. The types of trees planted include 20 Meranti trees. The report is equipped with photo documentation before, during and after the planting activity.</p> <p>Minutes of 13 May 2024, installation HCV banner/signboard of the Jambi River Riparian in blocks PL0041 and PL0043 UAE, signboard "No Hunting for Protected Wild Animals" in blocks PL0041 and PL0043 UAE, with the notes is in good condition. The report is equipped with photo documentation for each signboard/banner.</p> <p>Based on field visits at the Paya Tarung Riparian River, it is known that meranti trees are being planted as a revegetation/enrichment effort which refers to the recommendations of PT Usaha Agro Indonesia's HCV management plan.</p>
Root Cause Analysis:	<p>There has not been a review of the implementation of the HCV management plan based on the PT Usaha Agro Indonesia HCV Study Report and the PT Usaha Agro Indonesia HCV Management and Monitoring Report implemented by the company.</p>
Corrective Actions:	<p>Conduct a review of the implementation of the HCV management plan based on the PT Usaha Agro Indonesia HCV Study Report and the PT Usaha Agro Indonesia HCV Management and Monitoring Report which is implemented by the company periodically every year.</p> <p>Verified during NCR Close Out Visit:</p> <p>The company shown Management and Monitoring HCV Report period 2023/2024</p>
Assessment Conclusion:	<p>PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate correction and corrective action. The Major NC closed satisfactorily.</p>

Non-conformity			
NCR Ref #	2470310-202403-N1	Issued Date	23/03/2024
Due Date	Next ASA-1.2	Closure Date	
Indicator & Category (Critical / Minor)	2.2.2 Minor		
Statement of Nonconformity:	The company has not been able to show sufficient evidence that it has an effective documented system to ensure legal compliance of all contracted third parties.		
Requirement Reference:	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.		
Objective Evidence:	<p>The company shows a list of contractors, where there are contractors who provide labor services (outsourcing) on behalf of individuals (head of contract), for example:</p> <ul style="list-style-type: none"> • Agus Saputra (pruning) • Nasrun Hidayat (<i>piringan manual</i>) • Khanipudin (<i>gawangan manual</i>) • Ardian (POME application) • Gou Kwek Fi (pruning) <p>The company shows a Work Agreement Number 004/SPK-LKL/UAI-KAE/III/2024 between the Estate Manager of KAE PT UAI and Melda as the Contractor, with a validity period of 01 to 25 March 2024, type of pruning work in Division 3 Keruing Agro Estate. In the agreement the following requirements are required:</p> <ul style="list-style-type: none"> • Article 8, the contractor is fully responsible for the safety of the workers being worked on and everything related to ASTEK as well as all work incidents/accidents that occur while the contractor is carrying out work. • Article 12 point (2) contractors are child labor is prohibited or workers resulting from human trafficking crimes. • Article 12 point (3) contractors are obliged to comply with and implement all statutory regulations in the field of OHS. <p>In the contract attachment, there is a list of names of Melda contractor workers, including: Mane Ardiansah, Nia Astuti, Menggap, Iwan Irawan, Umar, Juni. The age of the youngest worker is 21 years and the oldest is 43 years.</p> <p>Results of interviews with contractors on behalf of Melda (not on the list of contractors) as labor providers (outsourcing) for pruning activities in Division II KAE (in February 2024) and in Division III KAE (in March 2024). The contractor is in the name of an individual and is not yet a legal entity with a total of 16 workers. The applicable wage provisions are the price to the agreement with the worker. Workers have not insurance registered with <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>.</p> <p>Public consultations with the Ketapang Regency Manpower and Transmigration Agency stated that for companies that use third party workers (outsource), they</p>		

	<p>must refer to applicable regulations, for example the contractor has a legal entity, workers are registered with <i>BPJS Ketenagakerjaan</i> for at least 2 programme (<i>Jaminan Kecelakaan Kerja</i> and <i>Jaminan Kematian</i>).</p> <p>As regulated in Minister of Manpower Regulation No. 11 of 2019 concerning the Second Amendment to the Regulation of the Minister of Manpower and Transmigration Number 19 of 2012 concerning Requirements for Handing over Part of the Work to Another Company, it states that:</p> <ul style="list-style-type: none"> Article 20: The Worker/Labourer Service Provision Agreement must be registered by the Worker/Labourer Service Provider at the agency responsible for the employment sector of the Regency/city where the work is carried out Article 21: In the event that the work agreement for the provision of labor/labour services meets the requirements of the agency responsible for issuing proof of registration no later than 3 (three) working days after the complete application is received. Article 24: Every company providing worker/labor services is required to have a business license to provide worker/labor services. Have a business registration number issued by the OSS Institution <p>Minister of Manpower Regulation 35 of 2021 Article 20 Outsourcing Companies must be legal entities and must comply with business permits issued by the Central Government.</p> <p>Based on the explanation above, the company has not been able to show sufficient evidence that it has an effective documented system to ensure legal compliance of all contracted third parties.</p>
Corrections:	<ul style="list-style-type: none"> Carry out legal compliance evaluations for all third parties who enter into work contracts with the company. Disseminate legal compliance to all third parties who enter into work contracts with the Company.
Root Cause Analysis:	Estate and Mill units do not yet understand the company's mechanisms or procedures FM-SAG-HO-PCR-010016 regarding evaluation of service providers.
Corrective Actions:	Carry out selection of all third parties who enter into work contracts with the company according to company procedures FM-SAG-HO-PCR-010016 regarding evaluation of service provider.
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.

Non-conformity			
NCR Ref #	2470310-202403-N2	Issued Date	23/03/2024
Due Date	Next ASA-1.2	Closure Date	
Indicator & Category (Critical / Minor)	3.3.3 Minor		

Statement of Nonconformity:	Certification Holder could not demonstrate the action taken from the agronomy continuous improvement is implemented accordingly
Requirement Reference:	Records of monitoring and any actions taken are maintained and available.
Objective Evidence:	<p>During field observation in sample block of Keruing Agro Estate (L14, J9, J10, M12, M14), Koperasi Jambi Mekar Jaya Sentosa, Ulin Agro Estate (K47, N36/37), Koperasi Perkebunan Sempurna Bersatu (C28) it was found the field condition was not properly maintained such as: saplings/kentosan, weeds on palm oil circle are less control, under pruning. There is no immediate action taken to address the issue.</p> <p>CH has conducted Agronomy Continual Improvement monthly as recorded in "Rekap Penilaian Kualitas Ancak" and "Rekap Penilaian Kualitas Buah" sample seen for period January – February 2024. There is no immediate action taken in accordance scoring result from assessment.</p>
Corrections:	Carry out weed control and pruning work in accordance with the results of <i>ancak</i> quality and FFB quality assessments carried out by ACI at Keruing Agro Estate (Blocks L14, J9, J10, M12, M14), Koperasi Jambi Mekar Jaya Sentosa, Ulin Agro Estate (Blocks K47, N36 /37) and the Koperasi Perkebunan Sempurna Bersatu (Block C28).
Root Cause Analysis:	Actions taken from continuous agronomic improvements carried out by ACI based on <i>ancak</i> quality and FFB quality assessments have not been followed up by the estate due to weed control efforts and the implementation of pruning work following the annual work plan made by the estate.
Corrective Actions:	Estate unit carries out continuous evaluation of the <i>ancak</i> quality and FFB quality assessments carried out by ACI.
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.

Non-conformity			
NCR Ref #	2470310-202403-N3	Issued Date	23/03/2024
Due Date	Next ASA-1.2	Closure Date	
Indicator & Category (Critical / Minor)	6.2.7 Minor		
Statement of Nonconformity:	The company has not been able to demonstrate that permanent full-time employment is used for all for all core work performed.		
Requirement Reference:	Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
Objective Evidence:	<p>Based on documents verification and interviews with workers during field visit, that there is the use of PKWT workers (temporary worker) on the core work.</p> <p>Based on interviews with harvest workers on the block C.28 Afdeling 3 MAE, there are workers with status PKWT/KHL:</p>		

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	<ul style="list-style-type: none"> Worker on behalf of Da*** have been worked for more than 1 years. Worker on behalf of Min ** the * has been working for more than 1 year <p>Based on the verification document, there is a harvesters worker with the status of PKWT (contract workers)/KHL (casual workers), as follows:</p> <ul style="list-style-type: none"> Harvesters on behalf of zainudin, harvesters in division 3 UAE, Perjanjian Kerja Waktu Tertentu dated 25 January 2024 and valid until 25 January 2026. Harvesters on behalf of zainudin, harvesters in division 2 KAE, Perjanjian Kerja Waktu Tertentu dated 18 January 2024 and valid until 18 January 2026
Corrections:	Appoint <i>KHT</i> (permanent daily workers) status to harvest employees who have worked for 3 months and meet the company's qualifications. If you do not meet the qualifications, you will be transferred to a job other than harvesting
Root Cause Analysis:	<p>Companies have difficulty getting experienced harvest workers, so the workers recruited are workers who have never worked as harvesters and must be trained first for some time so that their performance progress can be seen. So some harvester the status as follows:</p> <ul style="list-style-type: none"> Employees who have not been appointed <i>KHT</i> (permanent daily workers) harvesters for more than 1 year because they do not meet the qualifications and skills to become harvesters so their performance still needs to be re-evaluated. Employees who have only worked for 3 months have not been appointed as <i>KHT</i> (permanent daily workers) because their performance is still being seen to see whether they are capable or not.
Corrective Actions:	Evaluate the mechanism for recruiting harvest workers with <i>PKWTT</i> (permanent workers) status, where harvest work is the core job.
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.

Non-conformity			
NCR Ref #	2470310-202403-N4	Issued Date	23/03/2024
Due Date	Next ASA-1.2	Closure Date	
Indicator & Category (Critical / Minor)	7.3.1 Minor		
Statement of Nonconformity:	The company cannot show evidence that hazardous waste management is in accordance with applicable regulations.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.		
Objective Evidence:	The company has Hazardous Waste Storage (<i>TPS Limbah B3</i>) located in the KAE Head Office area and in the UAI Mill area, referring to the <i>Rincian Teknis Penyimpanan Limbah Bahan Berbahaya dan Beracun (Limbah B3)</i> PT Usaha Agro Indonesia, No. P/2614/PERKIMLH-D.660.1/XI/2021, dated 23 Nov 2021. In the <i>Rincian Teknis</i> it is stated that:		

	<ul style="list-style-type: none"> Point 5. hazardous waste storage activities are carried out after obtaining environmental approval. Appendix Section D.5. Hazardous Waste packaging must have Hazardous Waste symbols and labels attached in accordance with the provisions of legislation on packaging and/or other containers in accordance with the characteristics of Hazardous Waste. <p>During the field visit:</p> <ul style="list-style-type: none"> At the Hazardous Waste Storage in KAE and Mill, it was found that temporary storage activities for hazardous waste were still being carried out even though there was no environmental approval, and symbols for hazardous waste were found that were not in accordance with the provisions of statutory regulations. At the MAE Clinic, medical waste was found that was not sent to the Hazardous Waste Storage. The last delivery of medical waste by MAE will be in December 2023.
Corrections:	<ol style="list-style-type: none"> Write a letter to the relevant agency requesting direction for integrating environmental approvals PT Usaha Agro Indonesia. Install symbols and labels in accordance with Minister of Environment and Forestry Regulation No. 14 of 2013 concerning Symbols and Labels for Hazardous and Toxic Waste. Hand over infectious waste found at the MAE clinic to the hazardous waste storage in accordance with company procedures P-SAG-KBN-LMB-01 <i>tentang Pengendalian Limbah di Kebun</i> and PermenLHK No 56 tahun 2015.
Root Cause Analysis:	<ol style="list-style-type: none"> The company has managed hazardous waste by referring to the Technical Details for Storage of Hazardous and Toxic Waste PT Usaha Agro Indonesia, No. P/2614/PERKIMLH-D.660.1/XI/2021, dated 23 Nov 2021, but administratively the company has not consulted to make a request regarding the integration of environmental approvals (<i>PPA, PPU, PLB3</i>) Hazardous Waste Officers do not understand the hazardous waste symbols and labels in accordance with <i>PermenLHK No 14 Tahun 2013</i> concerning Symbols and Labels for Hazardous and Toxic Waste. Medical officers do not understand the management of hazardous waste (infectious waste) in accordance with <i>PermenLHK No 56 tahun 2015</i>.
Corrective Actions:	<ol style="list-style-type: none"> Carry out directions according to the results of consultations from relevant agencies for the integration of environmental approvals PT Usaha Agro Indonesia. Conduct outreach on hazardous waste management to hazardous waste management officers regarding symbols and labels in accordance with Minister of Environment and Forestry Regulation No. 14 of 2013 concerning Symbols and Labels for Hazardous and Toxic Waste. Conduct socialization on hazardous waste management to medical officers in accordance with company procedures P-SAG-KBN-LMB-01 <i>tentang Pengendalian Limbah di Kebun</i> and Minister of Environment and Forestry Regulation No. 56 of 2015.

Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.
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Non-conformity						
NCR Ref #	2470310-202403-N5	Issued Date	23/03/2024			
Due Date	Next ASA-1.2	Closure Date				
Indicator & Category (Critical / Minor)	7.8.3 Minor					
Statement of Nonconformity:	The company cannot show sufficient evidence that the liquid waste application has been carried out in accordance with applicable regulations.					
Requirement Reference:	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.					
Objective Evidence:	The company has Land Application permit based on <i>Keputusan Bupati Ketapang</i> No. 400/PERKIMLH-C/2017, dated 25 July 2017, concerning Permits for Utilization of Waste Water for Application to Land for the Palm Oil Plantation of PT Usaha Agro Indonesia covering an area of 163.66 Ha located in Manismata District, Ketapang Regency. The permit is valid for 5 years, so it expires on 24 July 2022.					
	Available Letter from the <i>Kepala Dinas Perumahan Rakyat Kawasan Permukiman dan Lingkungan Hidup</i> No. B/0963/PERKIMLH-E.660.1/VI/2022, dated 17 June 2022, concerning Land Application Directions, states that "PT UAI's Waste Water Utilization Permit does not need to be extended and is declared to remain valid as long as it meets the provisions as stated in Attachment I to the <i>Keputusan Bupati Ketapang</i> No. 400/PERKIMLH-C/2017.					
	Based on the Attachment to <i>Keputusan Bupati Ketapang</i> No. 400/PERKIMLH-C/2017, dated 25 July 2017, the application block consists of 29 blocks, namely:					
	No.	Block	Area irrigated (Ha)	No.	Block	Area irrigated (Ha)
	1	NA17A	8.90	16	P021	2.03
	2	O021A	6.10	17	N014A	5.87
	3	O018	4.10	18	O015A	0.38
	4	P019A	9.79	19	N014B	2.16
	5	O017	3.67	20	O016B	1.71
	6	N016A	8.51	21	N014C	2.51
	7	O014	14.56	22	P019B	3.20
	8	N015A	9.02	23	P018B	4.94
	9	O013	4.82	24	O021B	2.61
	10	O019	12.80	25	N016B	13.37
	11	O016A	1.72	26	O015C	2.82
12	O020	17.13	27	N016	0.50	
13	P018A	5.58	28	O20	0.51	
14	P020	2.60	29	N016B	8.00	

	15	O015A	11.75	Total	163.66
	Study land and control land				
	No.	Block	Area irrigated (Ha)		
	1	N014A	5.87		
	2	N015A	9.02		
	3	N016A	8.51		
	4	NA17A	8.90		
	5	N016B	8.00		
	Part III. Prohibition. Point c, the initiator is prohibited from disposing of wastewater on land outside the designated area.				
	During the field visit, Land Application was carried out on Block N015A which was equipped with a monitoring well to analyze wastewater, especially BOD, on a regular basis. However, in other locations it was found that PKS liquid waste was applied by pouring it on plates that had been given empty support and mineral soil, in blocks that were not included in the LA permit, namely Block N052 UAE.				
Corrections:	Stop the use of liquid waste for sand rehabilitation activities in block IN0052				
Root Cause Analysis:	Utilization of liquid waste outside land applications in the IN0052 sand rehabilitation area is still in the trial phase and is not sustainable. So, estate understanding does not require permits according to applicable regulations. If the results of the trial have a positive impact on the plants, it will be carried out consistently and permits will be obtained from the relevant agencies.				
Corrective Actions:	Consult with the local Environmental Agency whenever there are activities related to the use or application of liquid waste.				
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.				

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.3.1 Status of Nonconformities Previously Identified and Observations

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2355770-202306-M1	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	1.1.3 (Critical)		
Statement of Nonconformity:	Based on interviews with workers' samples and related stakeholders, several requests for information were delivered, however the certification unit could not show a record of information requests and responses.		
Requirement Reference:	Records of requests for information and responses are maintained.		
Objective Evidence:	<p>Certification Unit has a form for recording communications and responses in the "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).</p> <p>Based on interviews with a sample of workers and related stakeholders, several requests for information were submitted, however, the certification unit was unable to show records of requests for information and their responses.</p> <p>Example:</p> <ul style="list-style-type: none"> Harvester and fruit collector employees at Ulin Agro Estate submitted a request for information regarding details of salary deductions, but there was no record of it in the Stakeholder Communication Logbook. The management of the Koperasi Jambi Mekar Jaya Sempurna (JMJS) submitted a request for information related to the Monthly and Annual Work Plans, as well as Monthly Activity Results Reports at Plasma which are not routinely submitted, but there are no records in the Stakeholder Communication Logbook. 		
Corrections:	<p>Record and provide responses to every recorded request for information received from both employees and external parties into the "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).</p> <p>Data verified during NCR Close Out Visit:</p> <ul style="list-style-type: none"> Review of the Communication & Stakeholder Response Logbook document at KAE. Related: Leaking house roof (reported by Mr Feri Huan for inspection and repair dated July 15, 2023). Status: has been followed up and closed. Review of the Communications & Stakeholder Response Logbook document in the UAE. Related: Leaking floor condition (reported by Nasya (block A1), to be 		

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	<p>checked and repaired on 12 August 2023). Status: has been followed up and closed.</p> <ul style="list-style-type: none"> Dissemination document related to Stakeholder Logbook (LB-SAG-HO-CA&L-080001).and Wages, dated 24 August 2023. Location in Meranti Agro Estate, that was attended by 68 workers. Based on the results of interviews with sample employees (dated 12 September 2023), information was obtained that they understood the process of submitting information requests.
Root Cause Analysis:	The certification unit (UAE, KAE, MAE) does not yet understand the mechanism for recording and responding to information requests submitted to the company in the "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).
Corrective Actions:	<p>Carrying out dissemination regarding recording mechanisms and responding to requests for information in accordance with the P-SAG-HO-CA&L-08 procedure, 2nd revision dated 1 February 2016 concerning Communication, Participation and Consultation, and conducted dissemination to workers related "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).</p> <p>Data verified during NCR Close Out Visit:</p> <p>Dissemination document related to Stakeholder Logbook (LB-SAG-HO-CA&L-080001) and Wages Issues to workers, dated 24 August 2023. Location at Meranti Agro Estate, that was attended by 68 workers</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.
Effectiveness Closure (for previous audit closed Critical NC):	This NC Critical remains closed

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2355770-202306-M2	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	1.1.4 (Critical)		
Statement of Nonconformity:	Sampoerna IMS Procedure - Communication, Participation and Consultation, no: P-SAG-HO-CA&L-08 has not been understood by relevant stakeholders.		
Requirement Reference:	Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.		
Objective Evidence:	<p>The Certification Unit has the Sampoerna IMS Procedure document - Communication, Participation and Consultation, no: P-SAG-HO-CA&L-08, 2nd revision dated 1 February 2016. This procedure is approved by the CEO and is available in Indonesian.</p> <ul style="list-style-type: none"> Based on interviews with a sample of harvesting and harvesting workers, they submitted complaints regarding work bases, premiums, fines, and salary cuts, but they stated that they did not know where to submit these complaints. 		

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	<ul style="list-style-type: none"> There were several complaints and requests for information submitted by workers and stakeholders, but they were not recorded in the Stakeholder Communication Logbook (LB-SAG-HO-CA&L-080001).
Corrections:	<p>Record and respond to complaints and requests for information submitted by workers and stakeholders in the Stakeholder Communication Logbook (LB-SAG-HO-CA&L-080001)</p> <p>Data verified during NCR Close Out Visit:</p> <ul style="list-style-type: none"> Review of the Communication & Stakeholder Response Logbook document at KAE. Related: Leaking house roof (reported by Mr Feri Huan for inspection and repair dated July 15, 2023). Status: has been followed up and closed. Review of the Communications & Stakeholder Response Logbook document in the UAE. Related: Leaking floor condition (reported by Nasya (block A1), to be checked and repaired on 12 August 2023). Status: has been followed up and closed. Dissemination document related to Stakeholder Logbook (LB-SAG-HO-CA&L-080001), and Wages, dated 24 August 2023. Location in Meranti Agro Estate, that was attended by 68 workers. Based on the results of interviews with sample employees (dated 12 September 2023), information was obtained that they understood the process of submitting information requests.
Root Cause Analysis:	<p>The certification unit (UAE, KAE, MAE) does not yet understand the procedures of P-SAG-HO-CA&L-08, 2nd revision dated 1 February 2016 concerning Communication, Participation and Consultation. There are several complaints and requests for information submitted by workers and stakeholders that have not been properly documented in the Stakeholder Communication Logbook (LB-SAG-HO-CA&L-080001).</p>
Corrective Actions:	<p>Carrying out socialization regarding recording mechanisms and responding to requests for information in accordance with the P-SAG-HO-CA&L-08 procedure, 2nd revision dated 1 February 2016 concerning Communication, Participation and Consultation, and conducted dissemination to workers related "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).</p> <p>Data verified during NCR Close Out Visit:</p> <p>Dissemination document related to Stakeholder Logbook (LB-SAG-HO-CA&L-080001) and Wages Issues to workers, dated 24 August 2023. Location at Meranti Agro Estate, that was attended by 68 workers</p>
Assessment Conclusion:	<p>PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>This NC Critical remains closed</p>

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2355770-202306-M3	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	3.5.2 (Critical) Escalation of minor NC on ASA-4		
Statement of Nonconformity:	Based on interviews and site visits, the auditor found several workers who did not have a PKWT Work Agreement as required in the Sampoerna Agro IMS Procedure –Recruitment No. P-SAG-ADM-KTU-04 revision 2 dated March 1, 2018.		
Requirement Reference:	Employment procedures are implemented and records are maintained.		
Objective Evidence:	<p>The Certification Unit has the Sampoerna Agro IMS Procedure –Recruitment No. P-SAG-ADM-KTU-04 revision 2 dated March 1, 2018.</p> <p>In the procedural attachment the stages of PKWT recruitment are explained, and in number 7.9 it is stated that the Work Unit Leader makes a work agreement between the Company and Employees (WI-SAG-ADM-KTU-0401), after which the workforce signs a form of understanding and approval for employee induction (FM-SAG-ADM-KTU-040002)</p> <p>Based on interviews and site visits, the auditor found several workers who did not have PKWT Work Agreement documents.</p> <p>Example:</p> <ul style="list-style-type: none"> On behalf of Mr. S***** (Harvester), the work location at JMJS Division 3 and Ulin Agro Estate has been working for 3 months. On behalf of Mr. T***** (Harvester), the work location at JMJS Division 3 and Ulin Agro Estate has been working for 1.5 months. On behalf of A**** (Harvest Assistance Workers), the work location at JMJS Division 3 and Ulin Agro Estate has been working for 17 days 		
Corrections:	<p>Inform and provide copies of work agreement documents to harvest, maintenance and other workers in accordance with company procedures.</p> <p>Data verified during NCR Close Out Visit:</p> <p>The auditor has verified that all employees have contract documents, both for permanent employees (PB and KHT) and contract employees (PKWT). This proof is available in Minutes document of handover (Berita Acara Serah Terima Dokumen), as follows:</p> <ul style="list-style-type: none"> Minutes document of handover of Employee Work Agreement Letter, dated 16 August 2023 at Ulin Agro Estate, for example Mr Ahmad Zarkasi (Division 1, harvester worker, accompanied by signature), Mrs Brigita Permatasari (Division 1, fertilizer application worker, accompanied by signature), and Mr Hasan Basi (Division 2, chemist application worker, accompanied by signature) Minutes document of handover of Employee Work Agreement Letter, dated 16 August 2023 at Kruing Agro Estate, for example Mr Hendi Mardane (Division 2, workers of loading the FFB, accompanied by signature), Mr Yacob Tapah (Division 2, fertilizer application worker, accompanied by signature) 		

	<ul style="list-style-type: none"> Based on the results of interviews with employees during the NCR closure visit process (dated 12 September 2023), confirmation was obtained that all employees had signed employment contracts and had copies of these documents.
Root Cause Analysis:	Delay by unit officers in providing copies of work agreement documents to harvest, maintenance and other workers in accordance with company procedures.
Corrective Actions:	<p>Coordinate with the HRD Department to:</p> <ul style="list-style-type: none"> Conduct socialization regarding work agreement documents in accordance with company procedures. Carry out periodic monitoring of the handover and provide copies of work agreement documents to workers in accordance with company procedures. <p>Data verified during NCR Close Out Visit: Dissemination document related to Agreement Process and Its Compliance with relevant regulation, dated 14 August 2023. Location in General Manager Office in PT UAI, that were attended by 19 staff and representative of employee.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.
Effectiveness Closure (for previous audit closed Critical NC):	This NC Critical remains closed

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2355770-202306-M4	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	Not all activities within the scope of PT Usaha Agro Indonesia have been risk analyzed.		
Requirement Reference:	All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>The certification unit has updated its risk analysis in January 2023, but this document does not yet cover all activities within the scope of the company, for example:</p> <ul style="list-style-type: none"> Monitoring HGU boundaries HCV Management and Monitoring Activities of contractors working in factories and plantations Fire monitoring activities in the fire tower. 		
Corrections:	<p>Review risk analysis documents based on all activities within the scope of the company, for example:</p> <ul style="list-style-type: none"> Monitoring HGU boundaries 		

	<ul style="list-style-type: none"> • HCV Management and Monitoring • Activities of contractors working in factories and plantations • Fire monitoring activities in the fire tower. <p>Data verified during NCR Close Out Visit: All the activities in operation unit have been identified at the risk assessment document, including monitoring of HGU boundaries, HCV inspection, contractor activities and monitor of fire.</p> <ul style="list-style-type: none"> • Review of the document risk assessment as per "Analisa Risiko Operasional (ORM), Aspek Mutu, Lingkungan dan Keselamatan Kesehatan Kerja", form number: FM-SAG-HO-SUS-070006, Unit Operation: Kruing Agro Estate, last review on 22nd July 2023. All the operation activities in estate have been identified. • Review of the document risk assessment as per "Analisa Risiko Operasional (ORM), Aspek Mutu, Lingkungan dan Keselamatan Kesehatan Kerja", form number: FM-SAG-HO-SUS-070006, Unit Operation: Ulin Agro Estate, last review on 24th July 2023. All the operation activities in estate have been identified.
Root Cause Analysis:	<p>Activities such as:</p> <ul style="list-style-type: none"> • Monitoring HGU boundaries • HCV Management and Monitoring • Activities of contractors working on factories and gardens • Fire monitoring activities in Fire tower. <p>It has not been identified in the risk analysis document that has been updated by the company because procedures related to this activity were not evaluated when creating the risk analysis document.</p>
Corrective Actions:	<p>Identify every activity and new activities within the scope of the company and carry out risk analysis based on the activities and new activities that have been identified in accordance with company procedures.</p> <p>Data verified during NCR Close Out Visit: All the activities in operation unit have been identified at the risk assessment document of UAI Palm Oil Mill, Meranti Agro Estate, Ulin Agro Estate and Kruing Agro Estate.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.
Effectiveness Closure (for previous audit closed Critical NC):	Not effective, this NC Critical was issued again during ASA-1.1, recurring NC Critical

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2355770-202306-M5	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	3.8.7 (Critical)		
Statement of Nonconformity:	The company has not fully indicated its FFB sources from certified and non-certified areas.		
Requirement Reference:	Purchasing and Goods In i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.		
Objective Evidence:	Detailed data on certified and non-certified FFB supply source blocks is not yet available, considering that there are Core plantation areas that are subject to sanctions for planting without NPP and amalgamation of the Koperasi Jambi Mekar Jaya Sempurna block.		
Corrections:	Providing detailed data on certified and non-certified FFB supply source blocks in the Core plantation area which received sanctions for planting without NPP and amalgamation of the Koperasi Jambi Mekar Jaya Sempurna block. Data verified during NCR Close Out Visit: All the unit operation (UAE, KAE, MAE) has demonstrated the document of Identify RSPO Sustainable and Non-Sustainable Blocks, sample seen: <ul style="list-style-type: none"> In Kruing AGro Estate, based on "Identifikasi Blok Sustainable & Non-Sustainable RSPO", updated in August 2023. Sample of Non-Sustainable block in Division 2, block IK0016 (11.76 Ha), block IM0012 (11.07 Ha), block IM00014 (5.35 Ha) and block IL0014 (24.23). All FFBs generated from this block are not claimed to be certified FFBs. In Meranti Agro Estate, based on "Identifikasi Blok Sustainable & Non-Sustainable RSPO", updated in August 2023. Sample of Non-Sustainable block in Division 2, block PD0005 (2.76 Ha), PD0008 (13.09 Ha), PE0012 (16.45). All FFBs generated from this block are not claimed to be certified FFBs. In Ulin Agro Estate, based on "Identifikasi Blok Sustainable & Non-Sustainable RSPO", updated in August 2023. Sample of Non-Sustainable block in Division 2, block IM006 (9.29 Ha), block IN0041 (17.05 Ha), and block IM0051 (13.93 Ha). All FFBs generated from this block are not claimed to be certified FFBs. Based on the field visit (dated 12 September 2023), it was found that the non-sustainable blocks had been clearly identified, apart from that the PIC was also able to explain the condition of the blocks.		
Root Cause Analysis:	Detailed data on certified and non-certified FFB supply source blocks has not been adjusted to data on amalgamated core plantation and plasma areas.		

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Corrective Actions:	Updating detailed data on certified and non-certified FFB supply source blocks in amalgamated core and plasma plantation areas. Data verified during NCR Close Out Visit: All the unit operation unit (UAE, MAE and KAE) has demonstrated the document of Identified RSPO Sustainable and Non-Sustainable Blocks. The document updated in August 2023.
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.
Effectiveness Closure (for previous audit closed Critical NC):	This NC Critical remains closed

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2355770-202306-M6	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	6.2.2 (Critical)		
Statement of Nonconformity:	Employees at PT. Usaha Agro Indonesia stated that they did not know the information on the basic calculation of wages and basic deductions stated on the pay slip.		
Requirement Reference:	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.		
Objective Evidence:	Based on interviews with harvest and harvest workers at KAE, MAE, UAE, they stated that they did not know the information on the wholesale basis, the basis for deductions and the nominal value of the deductions stated on the pay slip, and they stated that they did not know where to ask for clarity regarding this matter.		
Corrections:	The company is conducting socialization again regarding information on wage components including basic salary, premiums, deductions/compensation to all workers. Data verified during NCR Close Out Visit: Auditor team has interview with sample of smallholder, example: Mrs Wiwik Kardasih (in Ulin Estate, as manual weeding worker), Mrs Mahmudah (in Kruing Estate, pesticides applicator), Mrs Sariya (in Kruing Estate, as pesticides applicator) and they can explain and understand the information on the basic calculation of wages and basic deductions stated on the pay slip.		

	<p>Moreover, based on review of Contractual Agreement also has been stated the clauses related regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice. For example:</p> <ul style="list-style-type: none"> Employee Work Agreement Letter, dated 16 August 2023 at Ulin Agro Estate, for example Mr Ahmad Zarkasi (Division 1, harvester worker, accompanied by signature), Mrs Brigita Permatasari (Division 1, fertilizer application worker, accompanied by signature), and Mr Hasan Basi (Division 2, chemist application worker, accompanied by signature) Employee Work Agreement Letter, dated 16 August 2023 at Kruing Agro Estate, for example Mr Hendi Mardane (Division 2, workers of loading the FFB, accompanied by signature), Mr Yacob Tapah (Division 2, fertilizer application worker, accompanied by signature).
Root Cause Analysis:	The company has provided information and explanations on the wholesale basis, the basis for deductions and the nominal value of deductions stated on the pay slip, but the documentary evidence is not complete, and some employees do not understand this.
Corrective Actions:	<p>The company continues to provide information and explanations on the wholesale basis, the basis for deductions and the nominal value of the deductions stated on the pay slip to all employees.</p> <p>Data verified during NCR Close Out Visit:</p> <p>All workers are employed based on the Surat Perjanjian Kerja (Employment Agreement) which outlines items such as wages, overtime pay, holiday, working hours and days, insurance, medical, occupational safety, and health following the company regulation year 2022-2024, which approved by 'Dinas Tenaga Kerja & Transmigrasi'.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.
Effectiveness Closure (for previous audit closed Critical NC):	Not effective, this NC Critical was issued again during ASA-1.1, recurring NC Critical

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2355770-202306-M7	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	6.2.4 (Critical)		
Statement of Nonconformity:	The company has provided housing and household equipment for its workers, but there are still shortages because some workers live in other families' homes.		
Requirement Reference:	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.		

Objective Evidence:	Based on interviews with workers (loose fruit collector) of UAE, they stated that there was 1 worker who lived with another worker's family in 1 house; while other workers stated that their house accommodated 1 other worker from a different family in the house.
Corrections:	<ul style="list-style-type: none"> Collect data again between the number of workers' housing needs and the number of employees, both married and single. The company provides rental houses in the area around the company for employees who do not yet have housing facilities. <p>Data verified during NCR Close Out Visit:</p> <p>The company has prepared the document of listed housing provided under document "Daftar Penghuni Rumah PT Usaha Agro Indonesia" – updated in August 2023, in detail:</p> <p>At Ulin Agro Estate, such as:</p> <ul style="list-style-type: none"> Type G2 housing has a total of 46 units, the number of employees occupying 97 workers. Type G6 housing with 36 units, the number of employees occupying 108 workers. Type G10 housing with a total of 40 units, the number of employees occupying 121 workers. <p>All employees have their own homes with their respective families. There are no two or more families living in one house. This house facility is sufficient for all employees at Ulin Agro Estate.</p> <p>Based on field visits to housing (emplacement) at Ulin Agro Estate and Kruing Agro Estate (dated 12 September 2023), the auditor team found that housing facilities were adequate and continued to progress to ensure they were available for all employees.</p>
Root Cause Analysis:	The company has added employee housing facilities, but currently construction is still in progress. The company has prepared rental houses in the area around the company for employees who do not yet have housing facilities. However, the worker choose to live in the same house as another family in employee housing.
Corrective Actions:	<p>Providing and handing over housing facilities to employees who still live in the same house but with different families after the housing construction progress is complete.</p> <p>Data verified during NCR Close Out Visit:</p> <p>The company has shown a monitoring list of housing facilities for employees who have occupied homes. Based on the monitoring report for August 2023, there are no employees who do not have housing facilities.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.

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Effectiveness Closure (for previous audit closed Critical NC):	This NC Critical remains closed
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Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2355770-202306-M8	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	6.6.2 (Critical)		
Statement of Nonconformity:	It was found that care workers in the UAE with work relationships as PKWT were not based on a valid Fixed Time Work Agreement.		
Requirement Reference:	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.		
Objective Evidence:	Based on the document review, there is a "Specified Time Work Agreement No.PKWT/UAE/2022, namely Mrs Kristina (Manual Weeding)" dated March 14 2022. Article 2 states that the PKWT period for Care Employees is not appropriate, namely for 6 months for the period 03/14/2022 – 14 /03/2022 with wages IDR 115,520 per day. At the time of the interview, the worker concerned still had PKWT status.		
Corrections:	<p>Revised the editorial writing of the PKWT document No.PKWT/UAE/2022 dated March 14 2022, on behalf Mrs Kristina (manual weeding)</p> <p>Data verified during NCR Close Out Visit:</p> <p>PT Usaha Agro Indonesia has demonstrated the revised the document of Specific Time Work Agreement, namely Mr Kristina, as per document "Perjanjian Kerja Waktu Tertentu", namely Mrs Kritina (address Sungai Danau Village, Tanah Bumbu Regency) and on behalf company is Estate Manager in Ulin Agro Estate. In Article 1 mentioned that Mrs Kristina as Contract Workers, valid until 4th March 2024.</p> <p>Based on result of interview with sample employee during NCR visit (dated 12 September 2023), example: Mrs Wiwik Kardasih (in Ulin Estate, as manual weeding worker), Mrs Mahmudah (in Kruing Estate, pesticides applicator), Mrs Sariya (in Kruing Estate, as pesticides applicator) they have confirmed that all employees have a Specific Time Work Agreement document.</p>		
Root Cause Analysis:	There was an editorial error in writing the PKWT document No.PKWT/UAE/2022 dated March 14 2022, namely Mrs Kristina (manual weeding), which period should be 03/14/2022 – 09/13/2022.		
Corrective Actions:	<p>Coordination with the HRD Department to:</p> <ul style="list-style-type: none"> Conduct outreach to KTU regarding the mechanism for making PKWT documents to all workers. 		

	<ul style="list-style-type: none"> Conduct regular monitoring in analyzing employee work documents, whether they have PB, KHT, PKWT or contract status, therefore no more errors in writing or typing. <p>Data verified during NCR Close Out Visit: The site HRD has demonstrated the list of documents of Specific Time Work Agreement, updated in August 2023 as regular monitoring in analyzing employee work documents</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.
Effectiveness Closure (for previous audit closed Critical NC):	This NC Critical remains closed

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2355770-202306-M9	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	6.7.3 (Critical)		
Statement of Nonconformity:	The company has provided PPE for its workers, but there are some workers who use PPE not provided by the company.		
Requirement Reference:	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:	<p>Based on a review of the PPE Handover Minutes document, the company has provided PPE for its workers, however during site visits and interviews, there were several workers who used PPE not provided by the company, for example:</p> <ul style="list-style-type: none"> 2 (fruit collected workers) at KAE use AP shoes not given by the company. 1 driver transporting FFB at KAE use safety shoes not provided by the company. 1 EFB Applicator at KAE, 3 wholesalers at JMJS, 4 harvesters at JMJS and 1 grading worker at the loading ramp wearing AP shoes not given by the company. 		
Corrections:	<ul style="list-style-type: none"> Record the amount of PPE needed for each type of work based on the number of employees. Provide PPE as needed for each type of work based on the number of employees. <p>Data verified during NCR Close Out Visit: The company has provided the PPE to all employees, the record provided such as:</p>		

	<ul style="list-style-type: none"> In Ulin Agro Estate -> Data Monitoring Stock of PPE update on 23rd August 2023, i.e., safety helmet (32 pcs for blue type, 48 pcs for yellow type), face shield (61 pcs), AP boot (124 pcs), In Meranti Agro Estate -> Data Monitoring Stock of PPE update on 23rd August 2023, i.e., safety helmet (18 pcs for blue type), face shield (51 pcs), AP boot (91 pcs), N95 Dust Mask (30 pcs) In Kuring Agro Estate -> Data Monitoring Stock of PPE update on 23rd August 2023, i.e., safety helmet (11 pcs for blue type, 156 pcs for yellow type), face shield (129 pcs), AP boot (1110 pcs), apron (110 pcs), Carbon Mask (80 pcs), and N95 Dust Mask (75 pcs) <p>Based on field visit during NCR (dated 12 September 2023), in Kuring Agro Estate Division 02, the auditor team has interview with sample worker namely Mr Misawti (pesticides applicator), Mrs Siti Husnul (pesticides applicator) and Mrs Maria Aernesia (pesticides applicator), they have stated that the pesticide applicator employees have used PPE as required in the OHS risk assessment results document.</p> <p>Apart from this, the HSE team (sustainability on site) has provided a report on the use of PPE for all employees at the work site. examples are provided in APA inspection reports for July and August 2023, where it was reported that all employees were wearing PPE as required</p>
Root Cause Analysis:	The availability of PPE stock for workers is still less than the need. This is because worker turnover at PT UAI is quite high.
Corrective Actions:	<ul style="list-style-type: none"> Coordination with unit leaders and HRD to provide guidance and understanding in ensuring the availability of employees in each estate. Providing PPE stock in the warehouse as needed for each type of work based on the number of employees in each unit. <p>Data verified during NCR Close Out Visit: The company has demonstrated the List of Data Monitoring Stock of PPE (updated in August 2023). The documents shown that the availability of PPE is sufficient for employees.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.
Effectiveness Closure (for previous audit closed Critical NC):	This NC Critical remains closed

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2355770-202306-M10	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	7.2.6 (Critical)		

Statement of Nonconformity:	The company has provided training for pesticide application officers, but there are several workers whose training records are not available.
Requirement Reference:	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.
Objective Evidence:	Visits and interviews were conducted with spraying workers at Ulin Agro Estate and Meranti Agro Estate, however based on a review of documents there were several workers who did not have records that they had taken training in pesticide use, for example: Kristina (UAE), Belandina and Wiwin (MAE).
Corrections:	<ul style="list-style-type: none"> Identify spray workers who have not received training on pesticide use from the company. Conduct pesticide use training for several spray workers based on company identification results. <p>Data verified during NCR Close Out Visit: The company has provided the training program and delivered to all pesticide's applicators (Tim Unit Sempit – TUS), sample see:</p> <ul style="list-style-type: none"> In Kruing Agro Estate has carried the training on 18th August 2023 (time: 02.00 PM), the subject training is refreshment of the SOP on pesticides handling and application (SOP-SAG-KBN-PML-12 and P-SAG-KBN-PML-22). The training has attended by 15 workers, 5 Staff, 2 supervisor and 1 sustainability staff. In Meranti Agro Estate has carried the training on 18th August 2023 (time: 09.00 AM), the subject training is refreshment of the SOP on pesticides handling and application (SOP-SAG-KBN-PML-12 and P-SAG-KBN-PML-22). The training has attended by 14 workers, 6 Staff, 2 supervisor and 1 sustainability staff. In Ulin Agro Estate has carried the training on 19th August 2023 (time: 09.00 AM), the subject training is refreshment of the SOP on pesticides handling and application (SOP-SAG-KBN-PML-12 and P-SAG-KBN-PML-22). The training has attended by 20 workers, 4 Staff, 2 supervisor and 2 sustainability staff. <p>Based on field visit during NCR (dated 12 September 2023), in Kuring Agro Estate Division 02, the auditor team has interview with sample worker namely Mr Misawti (pesticides applicator), Mrs Siti Husnul (pesticides applicator) and Mrs Maria Aernesia (pesticides applicator), they have stated that provided the training program and delivered to all pesticide's applicators (Tim Unit Sempit – TUS)</p>
Root Cause Analysis:	The employees on behalf of Kristina (UAE), Belandina and Wiwin (MAE) are new employees, they did not take part in the pesticide use training, which was carried out on November 25, 2022, by the FQA team located at Kruing Agro Estate.
Corrective Actions:	<p>The unit makes a regular training schedule for pesticide use every year for all spray workers.</p> <p>Data verified during NCR Close Out Visit:</p>

	The company has prepared the annual training program, example in 2023 the training on handling and application pesticides have planned in August and December 2023.
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.
Effectiveness Closure (for previous audit closed Critical NC):	This NC Critical remains closed

Previous Audit Critical Minor Non-conformity			
NCR Ref #	2355770-202306-N1	Issued Date	18 June 2023
Due Date	ASA1-1	Closure Date	Open
Indicator & Category (Critical / Minor)	2.1.2 (Minor)		
Statement of Nonconformity:	Regulatory Identification and Evaluation Document at PT. Indonesian Agro Business has not been updated.		
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:	PT. Usaha Agro Indonesia has not yet updated the "Form for Identification of K3, Environmental, Plantation Regulations and Other Related Requirements" for the 2023 period. The last update is in 2022, which is not in accordance with the SOP "Sampoerna Agro Integrated Management System Procedure for Identification and Evaluation of Legislative Regulations and Requirements Others No.P-SAG-HO-SUS-06 r3" dated 1 September 2017 – Section 7.4 states that legal reviews are carried out once a year. Furthermore, the identification of regulations does not yet include the 2023 Ketapang Regency Minimum Wage regulations.		
Corrections:	Carrying out identification to update K3, Environmental, Plantation and other related requirements in 2023.		
Root Cause Analysis:	Implementation of SOP No.P-SAG-HO-SUS-06" dated 1 September 2017 concerning Identification and Evaluation of Legislative Regulations and Other Requirements has not been consistently implemented because the responsible officer has just joined. Therefore, in the identification of regulations there are still several regulations that have not been updated, such as the 2023 Ketapang Regency Minimum Wage regulations		
Corrective Actions:	Coordination with the Systems and Certification Team in terms of: <ul style="list-style-type: none"> Update regulatory identification documents related to K3, environmental, plantation and other related requirements every year. Request documents from the Compliance Assistant as the person in charge periodically 		

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Assessment Conclusion:	<p>Verification ASA-1.1</p> <p>The company has not been able to show sufficient evidence that it has an effective documented system to ensure legal compliance of all contracted third parties.</p> <p>Recurring Minor – Escalated to Critical</p>
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Previous Audit Critical Minor Non-conformity			
NCR Ref #	2355770-202306-N2	Issued Date	18 June 2023
Due Date	ASA1-1	Closure Date	Open
Indicator & Category (Critical / Minor)	5.2.2 (Minor)		
Statement of Nonconformity:	PT Usaha Agro Indonesia has not demonstrated a capacity building program for plasma/smallholders		
Requirement Reference:	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).		
Objective Evidence:	<p>Information obtained during consultation with the management of the Koeprasi Jambi Mekar Jaya Sempurna, stated that there were no programs and training provided to Plasma for institutional improvement, Agronomy, K3, FPIC, RSPO and other aspects.</p> <p>Based on a review of documents, the company was also unable to demonstrate a training program for Plasma.</p>		
Corrections:	The company began conducting training programs for plasma for institutional improvement, agronomy aspects, K3, FPIC, RSPO and others.		
Root Cause Analysis:	The partnership team and cooperative management have not yet prepared programs and training for Plasma to improve institutions, aspects of Agronomy, K3, FPIC, RSPO and others.		
Corrective Actions:	The company creates training programs for plasma for institutional improvement, agronomy aspects, K3, FPIC, RSPO and others every year.		
Assessment Conclusion:	<p>Verification ASA-1.1</p> <p>Based on interviews with Koperasi Jambi Mekar Jaya Sempurna and Koperasi Perkebunan Sempuran Bersatu and Koperasi Perkebunan Sempurna Mandiri stated that there were no programs and training provided to Plasma for institutional improvement, Agronomy, K3, FPIC, RSPO and other aspects.</p> <p>Based on a review of documents, the company was also unable to demonstrate a training program for Scheme Smallholder</p> <p>Recurring Minor – Escalated to Critical</p>		

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Previous Audit Critical Minor Non-conformity			
NCR Ref #	2355770-202306-N3	Issued Date	18 June 2023
Due Date	ASA 1-1	Closure Date	Open
Indicator & Category (Critical / Minor)	6.7.4 (Minor)		
Statement of Nonconformity:	PT Usaha Agro Indonesia has included its workers in the BPJS Health and Employment program, however there are several workers who do not yet have BPJS Health and Employment cards.		
Requirement Reference:	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.		
Objective Evidence:	<p>Based on a review of the Company Regulation documents, in Section 21 concerning BPJS, it states that employers include workers in the BPJS Employment program and include workers in the BPJS Health program.</p> <p>Based on field visits and interviews, there are several workers who do not yet have BPJS Health and BPJS Employment Cards, including 3 buyers at JMJS, 6 harvesters at JMJS, 2 buyers at KAE, and 1 worker with an empty contract application at KAE.</p>		
Corrections:	<ul style="list-style-type: none"> Several workers are still in the process of registering for BPJS Employment and Health due to problems with membership registration and administrative completeness. The company has not carried out socialization regarding the use of the JMO and JKN mobile applications. Currently BPJS Health and Employment does not issue cards in physical form, proof of BPJS Health and BPJS Employment membership can be accessed via JMO and JKN (mobile application). 		
Root Cause Analysis:	<p>Based on a review of the Company Regulation documents, in Section 21 concerning BPJS, it states that employers include workers in the BPJS Employment program and include workers in the BPJS Health program.</p> <p>Based on field visits and interviews, there were several workers who did not have BPJS Health and BPJS Employment Cards, including 3 wholesalers at JMJS, 6 harvesters at JMJS, 2 wholesalers at KAE, and 1 worker who applied empty baskets at KAE.</p>		
Corrective Actions:	The company carries out outreach regarding the use of JMO and JKN (mobile applications).		
Assessment Conclusion:	<p>Verification ASA-1.1</p> <p>Based on field visits and interviews with workers (PKWT/contract and KHL/casual status) revealed that workers had not yet registered for BPJS Ketenagakerjaan and BPJS Kesehatan.</p> <p>Recurring Minor – Escalated to Critical</p>		

Previous Audit Critical Minor Non-conformity			
NCR Ref #	2355770-202306-N4	Issued Date	18 June 2023
Due Date	ASA 1-1	Closure Date	Open
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Waste management has not been implemented properly		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>The results of the field visit to the Final Waste Disposal Site (TPSA) found:</p> <ul style="list-style-type: none"> Block N15 Division 2 Kruing Agro Estate and Block E28 Division 2 Meranti Agro Estate found that organic and inorganic waste was not separated. Block N15 Division 2 Kruing Agro Estate found used motor oil packaging (B3 waste) which was dumped in the TPSA hole. <p>This is not in accordance with the socialization of Waste Management and the Prohibition of Burning Policy dated 10th January 2023.</p>		
Corrections:	<ul style="list-style-type: none"> Separate organic and inorganic waste in the final waste disposal site (TPSA) Block N15 Division 2 Kruing Agro Estate and Block E28 Division 2 Meranti Agro Estate. Retrieve and hand over the used motor oil packaging that was thrown into the Final Waste Disposal Site (TPSA) hole in Block N15 Division 2 Kruing Agro Estate to the Temporary B3 Waste Storage Site. 		
Root Cause Analysis:	The lack of awareness of employees living in the Kruing Agro Estate and Meranti Agro Estate housing complex has not been consistent in carrying out the P-SAG-KBN-LMB-01 procedures regarding Waste Control in Gardens.		
Corrective Actions:	<p>Providing an awareness of waste by:</p> <ul style="list-style-type: none"> Socialization regarding Waste Control procedures in Plantations (P-SAG-KBN-LMB-01) to employees and their families who live in employee housing units in all units (PKS, KAE, UAE and MAE) Provide education regarding waste management, the dangers or risks posed by waste and the positive impacts if waste is managed properly and correctly 		
Assessment Conclusion:	<p>Verification ASA-1.1</p> <p>Based on field visits to <i>TPSA</i>, for example, in Block E29 Division 2 MAE, there are 2 holes for organic and inorganic waste which have been closed on March 15 2024, and there are 2 new holes for organic and inorganic waste. In the inorganic waste pit in the form of plastic waste, bottles, cans, etc., no hazardous waste was found.</p> <p>PT Usaha Agro Indonesia has identified the root cause, prepare correction and corrective action. All evidence has been verified at ASA-1.1 audit. Minor NC closed.</p>		

Previous Audit Critical Minor Non-conformity			
NCR Ref #	2355770-202306-N5	Issued Date	18 June 2023
Due Date	ASA 1-1	Closure Date	Open
Indicator & Category (Critical / Minor)	7.3.3 (Minor)		
Statement of Nonconformity:	Waste management is still found by burning it.		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	<p>Based on the results of field visits at the Kruing Agro Estate and Ulin Agro Estate housing complexes, it was still found that there was the practice of burning domestic waste around the housing complex.</p> <p>This is not in accordance with the socialization of Waste Management and the Prohibition of Burning on January 10, 2023.</p>		
Corrections:	<ul style="list-style-type: none"> Conduct outreach to workers living in the Kruing Agro Estate and Ulin Agro Estate employee housing locations regarding the prohibition on burning domestic waste in accordance with the P-SAG-KBN-LMB-01 procedure concerning Waste Control in Gardens. Post a notice prohibiting burning of rubbish at workers' housing locations. 		
Root Cause Analysis:	Lack of awareness of workers living in Kruing Agro Estate and Ulin Agro Estate housing regarding domestic waste management in accordance with P-SAG-KBN-LMB-01 procedures concerning Waste Control in K		
Corrective Actions:	<p>Provide understanding not to burn waste around housing by:</p> <ul style="list-style-type: none"> Prepared a schedule and conduct outreach to workers and their families who live in employee housing for all units (PKS, KAE, UAE and MAE) about domestic waste management in accordance with the P-SAG-KBN-LMB-01 procedure concerning Waste Control in Gardens. Providing education regarding waste management, the prohibition of burning waste, the dangers or risks posed by burning waste and the positive impacts if waste is managed properly and correctly 		
Assessment Conclusion:	<p>Verification ASA-1.1</p> <p>Based on field visits to employee housing at KAE, UAE, Mill and MAE, no rubbish burning was found around the housing. Waste is managed by collecting it in rubbish bins or sacks and transporting it twice a week, and then disposing of it to the <i>TPSA</i> (landfill).</p> <p>Based on field visit to <i>TPSA</i> revealed that <i>TPSA</i> was located in Block N KAE and Block E29 Division 2 MAE. <i>TPSA</i> at MAE has 2 holes for organic and inorganic waste which were closed on March 15 2024, and there are 2 new holes for organic and inorganic waste.</p> <p>PT Usaha Agro Indonesia has identified the root cause, prepare correction and corrective action. All evidence has been verified at ASA-1.1 audit. Minor NC closed.</p>		

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Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2355770-202306-M1	Critical	1.1.3	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M2	Critical	1.1.4	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M3	Critical	3.5.2	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M4	Critical	3.6.1	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M5	Critical	3.8.7	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M6	Critical	6.2.2	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M7	Critical	6.2.4	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M8	Critical	6.6.2	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M9	Critical	6.7.3	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M10	Critical	7.2.6	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-N1	Minor	2.1.2	18 Jun 2023	Escalated to Critical
2355770-202306-N2	Minor	5.2.2	18 Jun 2023	Escalated to Critical
2355770-202306-N3	Minor	6.7.4	18 Jun 2023	Escalated to Critical
2355770-202306-N4	Minor	7.3.2	18 Jun 2023	Closed, 23 Mar 2024
2355770-202306-N5	Minor	7.3.3	18 Jun 2023	Closed, 23 Mar 2024
2470310-202403-M1	Critical	2.1.2	23 Mar 2024	Closed, 22 May 2024
2470310-202403-M2	Critical (Recurring)	3.6.1	23 Mar 2024	Closed, 22 May 2024
2470310-202403-M3	Critical	3.8.9	23 Mar 2024	Closed, 22 May 2024
2470310-202403-M4	Critical	4.4.3	23 Mar 2024	Closed, 22 May 2024
2470310-202403-M5	Critical	5.2.2	23 Mar 2024	Closed, 22 May 2024
2470310-202403-M6	Critical (Recurring)	6.2.2	23 Mar 2024	Closed, 22 May 2024
2470310-202403-M7	Critical	6.7.4	23 Mar 2024	Closed, 22 May 2024
2470310-202403-M8	Critical	7.12.4	23 Mar 2024	Closed, 22 May 2024
2470310-202403-N1	Minor	2.2.2	23 Mar 2024	Open

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2470310-202403-N2	Minor	3.3.3	23 Mar 2024	Open
2470310-202403-N3	Minor	6.2.7	23 Mar 2024	Open
2470310-202403-N4	Minor	7.3.1	23 Mar 2024	Open
2470310-202403-N5	Minor	7.8.3	23 Mar 2024	Open

3.4 Stakeholders and Previous Land Owner / User Consultation

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

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Manpower Agency in Katapang Regency	Contacted by phone
Governmental Department	Department of Agriculture, Livestock and Plantation of Ketapang Regency	Contacted by phone
Governmental Department	Land Agency of Ketapang Regency	Contacted by phone
Governmental Department	Environmental Agency in Ketapang Regency	Contacted by phone
Communities	Secretary of Jambi Village	Face to face interview
Communities	Secretary of Sukaramai Village	Face to face interview
Communities	Head of Danau Buntar Village	Face to face interview
Contractor	Melda (Labor Provider) Pruning	Face to face interview
Contractor	FFB Transporter	Face to face interview
Internal	Head of Gender Committee (Ms. Lia Agustina)	Face to face interview
Internal	Member of LKS Bipartit (Catur Kridaningtias)	Face to face interview

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Previous Landowner	Presented below	Face to face interview
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Stakeholders comment	
	<p>Feedbacks: Manpower Agency of Katapang Regency</p> <ul style="list-style-type: none"> Period of 2023, there are no negative issues related to industrial relationships in Estate/Mill. PT UAI has paid their employees in accordance with the current minimum wage regulation of 2024. PT UAI has registered the Company Regulation. There were no cases of work fatality accidents reported to the Manpower Agency. PT UAI must continue to strive to maintain harmonization of OHS implementation as an effort to prevent work accidents. PT UAI are encouraged to ensure that if they use workers from third parties, they must be registered with <i>BPJS Ketenagakerjaan</i> for at least 2 programs (JKM and JKK) and that the third party is a legal entity. <p>Audit Team verification and response: Regarding the use of contractors engaged in labor supply services (one of which is for pruning work), this has been verified in indicator 2.2.2 and to be a non-conformity.</p>
	<p>Feedbacks: Department of Agriculture, Livestock and Plantation of Ketapang Regency</p> <ul style="list-style-type: none"> PT UAI's current permits are still valid, and no new permit applications have been submitted to the department. Mandatory reporting has been submitted to the department, but companies are encouraged to be more orderly in their reporting timelines. The last plantation business assessment was carried out in November 2021 with class II assessment results, and the re-assessment plan will be carried out no later than November 2024. The company has carried out the Development of Palm Oil Plantations in a Partnership Pattern between PT UAI and the Cooperative, and to date the management has been carried out well by the Company. With the scope of Partnership Pattern Palm Oil Plantation Development/Development, up to now it has reached 21.36% of the area cultivated by the Company. There have been no reports of land disputes to the department in the last 1 year. The company has carried out CSR activities in village communities around the company. The department knows what information can be accessed by stakeholders, and if the department requires information, the company provides a response to the requested information. <p>Audit Team verification and response: No negative issue to be followed up.</p>
	<p>Feedbacks: Land Agency of Ketapang Regency</p> <ul style="list-style-type: none"> PT UAI's current permits are still valid, and no new permit applications have been submitted to the department. Mandatory reporting has been submitted to the department. PT UAI is not included in the list of companies that own abandoned land. There were no land disputes or land claims reported to the department in the last 1 year period.

	<ul style="list-style-type: none"> PT UAI are encouraged if there is land that does not yet have HGU and IUP to submit it immediately so that land ownership becomes clear.
	Audit Team verification and response: No negative issue to be followed up.
	Feedbacks: Environmental Agency in Ketapang Regency <ul style="list-style-type: none"> Mandatory reporting has been submitted to the department, but companies are encouraged to be more orderly in their reporting timelines. During the last one-year period there have been no complaints or claims from the public or other institutions related to environmental pollution by the company. The agency has understood the mechanism for requesting information that applies to the company, if there is a request for information from the agency, the company quickly responds.
	Audit Team verification and response: No negative issue to be followed up.
	Feedbacks: Secretary of Jambi Village <ul style="list-style-type: none"> As residents of the village surrounding the company, that the company often provided community assistance. For example, watering roads during the dry season, providing clean water if there is a community celebration, Open job opportunities by providing information to the village office if there are job vacancies During period last year there will be no disputes between the community and the company.
	Audit Team verification and response: There is no negative issue that need for further verification
	Feedbacks: Secretary of Sukaramai Village <ul style="list-style-type: none"> The Company has implemented CSR programs for the local community. The company provides job opportunities for local communities. Socialization related to the prohibition of burning, the prohibition of hunting and protected area, as well as protected animals and flora has been conveyed to the community.
	Audit Team verification and response: There is no negative issue that need for further verification
	Feedbacks: Head of Danau Buntar Village <ul style="list-style-type: none"> The company has implemented CSR programs for local communities. Communication between the village and the company has been well established.
	Audit Team verification and response: There is no negative issue that need for further verification
	Feedbacks: Melda (Labor Provider) Pruning The contractor is in the name of an individual and is not yet a legal entity with a total of 16 workers. The applicable wage provisions are the price to the agreement with the worker. Workers have not insurance registered with <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i> .
	Audit Team verification and response: Regarding the use of contractors engaged in labor supply services (one of which is for pruning work), this has been verified in indicator 2.2.2 and to be a non-conformity.
	Feedbacks: FFB Transporter

	<ul style="list-style-type: none"> The agreement between the company and the contractor in the form of SPK the contractor has understood the company policy. No late payments from company to contractor
	Audit Team verification and response: There is no negative issue that need for further verification
	Feedbacks: Gender Committee A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. In 2024 there will be changes to the structure of the Gender Committee due to members resigning from PT UAI. Gender Committee activities include socialization of sexual harassment, complaints, identification the new mother need, etc. There are no issues related to sexual harassment. PT UAS has promoted the time to breastfeeding for woman worker during working time. Female workers have the right to get menstruation leave and maternity leave. Female workers in the spray and fertilizer division understand the prohibition against workers working with chemicals while pregnant or breastfeeding. To ensure that no female workers working in spray and fertilization activities are pregnant, a pregnancy test is carried out every month. If a female worker is found to be pregnant, the worker will be transferred to a non-chemical work. In 2023, there was no issue related sexual harassment, violation of reproduction rights, or gender related discrimination in recruitment or promotion.
	Audit Team verification and response: There is no negative issue that need for further verification
	Feedbacks: LKS Bipartit The <i>LKS Bipartit</i> last meeting was held in December 2023, with one discussion regarding employee complaints regarding the condition of damaged houses which had been followed up by the company. Employee complaints are recorded in the Communication Logbook. There were no reports of wage violations, worker discrimination, forced labor, child labor, and code of ethics violations.
	Audit Team verification and response: There is no negative issue that need for further verification

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
Jainudin	-	0.91	Yes – GRTT dated 10 June 2008	Yes	Complied
Jainudin		3.61	Yes – GRTT dated 10 June 2008	Yes	Complied

Jainudin		2.99	Yes – GRTT dated 10 June 2008	Yes	Complied
Jipit	-	0.52	Yes – GRTT dated 10 Sept 2008	Yes	Complied
Jipit	-	15	Yes – GRTT dated 12 Jan 2009	Yes	Complied
Miji	-	7.19	Yes – GRTT dated 15 Oct 2010	Yes	Complied
Dimpal	-	0.39	Yes – GRTT dated 10 Jul 2008	Yes	Complied
Damai	-	11.35	Yes – GRTT in December 2015	Yes	Complied
Depiansyah	-	17.46	Yes – GRTT in December 2015	Yes	Complied
Edy Susanto	-	1.72	Yes – GRTT in December 2015	Yes	Complied
Laurensius	-	18.55	Yes - GRTT in 12 Juli 2008	Yes	Complied

Previous land owner / user comment	
1	Feedbacks: <ul style="list-style-type: none"> - Dimpal - Jainudin - Depiansyah - Edy Susanto - Miji - Laurensius - Ipit Siyanto <ul style="list-style-type: none"> • The landowner has received compensation for land rights handed over to the company.

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	<ul style="list-style-type: none"> Land rights are handed over to the company without coercion
	Audit Team verification and response: Concerning the compensation, it has been verified by auditor and has been described in more detail in indicator.

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Key in certification unit name has complied with the Choose an item , 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 Key in certification unit name is Choose an item .	
Report prepared by	Acceptance of Assessment Conclusion
Name: Naila Karima	Name: Yusi Rosalina
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: PT Usaha Agro Indonesia
Title: Lead Assessor	Title: System & Certification 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: 05 June 2024	Date: 05 June 2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.			
Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -	PT Usaha Agro Indonesia has shown Memorandum Nomor 127/SUS/XI/2019, dated 16 November 2019 concern <i>Revisi Daftar Informasi yang dapat diakses oleh pemangku kepentingan</i> . The management documents available in form FM-SAG-HO-CA&L-080004-Revision 3 - " <i>Daftar Informasi Yang Dapat Diakses oleh Pemangku Kepentingan</i> " signed by Chief Executive Officer pada 01 November 2019. The document consisted of: A. Legal Aspect: Legality and Compliance to Requirement <ul style="list-style-type: none"> • "Izin Lokasi Perusahaan" • "Izin Pelepasan Kawasan" • "Bukti GRTT" • "Sertifikat HGU" • "Peta HGU dan Patok HGU" • "Bukti Monitoring Patok HGU" • "Izin Mendirikan Bangunan (IMB)" • "Dokumen ANDAL" • "Dokumen RKL/RPL" • "SK Kelayakan/Izin Lingkungan" • "Izin Usaha Perkebunan (IUP)" 	Complied

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		<ul style="list-style-type: none"> • "Penilaian Usaha Perkebunan" • "Dokumen Badan Hukum" • "Dokumen Kajian/Studi dan Izin Pemanfaatan Land Aplikasi" • "Izin Pemanfaatan Air Permukaan/Sungai" • "Bukti Retribusi Pajak Air Permukaan" • "Izin Pengeboran dan Pengambilan Air Tanah" • "Peta Jenis Tanah, Topografi, RTRW, Peta Lokasi dan Peta Areal Statement" • "Areal Statement" • "Perjanjian Kerjasama Antara Perusahaan dengan Plasma/Kemitraan" • "SK Gubernur tentang Penetapan Harga TBS Plasma/Kemitraan" • "Bukti Bayar Penjualan TBS dari Plasma/Kemitraan dan atau Pihak Ketiga" • "Informasi Harga TBS" • "Realisasi Pembangunan Plasma/Kemitraan dan Bukti Laporan Perkembangan Kebun Kemitraan ke Pemerintah" • Izin Tempat Penyimpanan Sementara Limbah B3" • "Rekomendasi masa simpan Limbah B3" • "Izin Pemasangan mesin-mesin (Boiler, Turbin, Genset, Sterilizer, Kompresor, Vacuum Dryer, Hoisting Crane" <p>B. Environmental & compliance to environmental regulations.</p> <ul style="list-style-type: none"> • "Identifikasi dan pengelompokkan aspek dan dampak K3 dan lingkungan" • Monthly report of effluent quality test report as seen on record "Sertifikat Hasil Uji Kualitas Limbah Cair" 	
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		<ul style="list-style-type: none"> • Evaluatiuon of effluent quality test as seen on record "Evaluasi Hasil Pengukuran Kualitas Limbah Cair (6 bulan sekali)" • Receipt of "Bukti Pelaporan Kualitas Limbah Cair kepada Pemerintah 3 (tiga) bulan sekali" • "Sertifikat Hasil Uji Kualitas Sumur Pantau, Sumur Kontrol, dan Sumur Warga Land Aplikasi (6 bulan sekali)" • "Sertifikat Hasil Uji Kualitas Lingkungan Kerja (6 bulan sekali)" • "Evaluasi Hasil Pengukuran Uji Kualitas Lingkungan Kerja (6 bulan sekali)" • "Sertifikat Hasil Uji Kualitas Tanah Land Aplikasi (1 tahun sekali)" • "Hasil Uji Emisi Sumber Bergerak (kendaraan)" • "Sertifikat Hasil Uji Kualitas Air Permukaan/Sungai (6 bulan sekali)" • "Evaluasi Hasil Pengukuran Kulaitas Air Permukaan/Sungai (6 bulan sekali)" • "Sertifikat Hasil Uji Kualitas Air Bersih (1 tahun sekali)" • "Bukti Penggunaan Air di PKS" • "Neraca Limbah B3" • "Dokumen Pelaporan Pengelolaan Limbah B3 (3 bulan sekali)" • "Dokumen Pengiriman LB3 kepada Pihak Ketiga yang memiliki izin" • Copy of "Kelengkapan Izin Pengangkutan/Pengelolaan/ Pemusnahan yang dimiliki oleh Pihak Ketiga" • "Surat Pernyataan dari Pihak Ketiga Transportir LB3 tidak dalam masalah lingkungan" • "Laporan Pelaksanaan RKL-RPL (6 bulan sekali) dan bukti Laporannya kepada instansi terkait". 	
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		<ul style="list-style-type: none"> • "Bukti Tera Ulang Jembatan Timbang" • "Bukti Kalibrasi tangka CPO dan Tangki Solar" • "Bukti Verifikasi Alat Ukur" • "Struktur Tanggap Darurat" • "Bukti Simulasi dan Evaluasi Tanggap Darurat" • "Nomor Teleon Darurat Internal dan Eksternal" • "Daftar Inventarisasi Alat Pemadam Kebakaran" • "Laporan Posisi APAR, Hydrantm dan P3K" • "Laporan Pengendalian Kebakaran" • "Laporan CSA/HCS & GHG" • "Identifikasi Sumber emisi GHG, Perhitungan GHG Tahunan dan Mitigasi GHG" • "Form Identifikasi Peraturan Perundangan Update" and Evaluation. • "Dokumen Identifikasi HCV" • "Rekaman sosialisasi HCV kepada stakeholder" • "Peta HCV Kebun" • "Laporan Monitoring dan Pengelolaan HCV" • LUCA Report <p>C. Bidang Best Management Practice</p> <ul style="list-style-type: none"> • "Rekaman Pembukaan Lahan" • Copy "dokumen prosedur dan atau petunjuk Teknis Agronomi" • "Rekomendasi pemupukan organik dan anorganik" • "Bukti Analisa Tanah (5 tahun sekali)" • "Bukti Analisa Daun (1 tahun sekali)" 	
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		<ul style="list-style-type: none"> • "Rekaman penerimaan TBS, sortasi TBS, proses pengolahan TBS, pengujian mutu CPO, dan pengiriman CPO" • "Hasil Perhitungan Mass Balance" • "Laporan Hasil Pengujian" • "Form Pengungkapan Kode Etik" <p>D. OHS and Worker</p> <ul style="list-style-type: none"> • "Dokumen K3" • "Surat Perjanjian Kerjasama antara Perusahaan dengan Kontraktor" • "Posisi Tenaga Kerja" • "Surat Keputusan/Memorandum Pemberian Upah" • "Slip gaji/bukti pembayaran upah pekerja" • "Bukti Pembayaran PBB, PPh, PPn, BPJS" • "Perjanjian Kerja Perusahaan dengan Karyawan" <p>E. Management policy</p> <ul style="list-style-type: none"> • "Kebijakan Keberlanjutan" • "Kebijakan Whistle Blowing" • "Rencana Bisnis Jangka Pendek (5 tahunan)" • "Rencana Tahunan Kegiatan Kebun dan Pabrik (Budget tahunan)" • "Rekaman Rapat Tinjauan Manajemen (Undangan, Daftar Hadir, Notulen, Foto)" • Public Summary of "Laporan Sertifikasi RSPO, ISOPO, ISCC, IMS dan Laporan Sertifikasi lainnya" • "Rencana dan Realisasi Perbaikan Berkelanjutan" 	
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		<ul style="list-style-type: none"> • "Rencana Pengurangan dan Pencegahan Polusi" • "Laporan Tahunan Perseroan" • "Buletin Perseroan Triwulanan" • "Majalah Derap" • "Corporate Presentation Booklet" • "Analyst Briefing Material" • "Laporan Keuangan Perseroan" • "Daftar Informasi" <p>F. Social</p> <ul style="list-style-type: none"> • "SOP P-SAG-HO-CA&L-08 tentang Komunikasi, Partisipasi dan Konsultasi" • "Proses dan Hasil Free, Prior, and Informed Consent (FPIC/Persetujuan Atas Dasar Informasi di Awal Tanpa Paksaan (PADIATAPA))" • "Rekaman Keluhan dan Pengaduan Pekerja dan Stakeholder (Selain Pekerja)" • "Logbook Komunikasi Stakeholder (Permintaan/Pemberian Informasi, Permintaan/Pemberian Bantuan)" • "Legalitas Koperasi Karyawan" • "Rencana dan Realisasi CSR" • "Dokumen Penilaian SIA" • "Rekaman Sosialisasi SIA Kepada Stakeholder" • "Rencana dan Laporan Pelaksanaan Rencana Kelola SIA" • "Laporan Review SIA" 	
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		<p>Information and/or documents submitted to external parties can be implemented, as long as (i) it constitutes the Company's obligations in accordance with applicable regulations; and (ii) requested in writing by the authorized government agency/official.</p> <p>Exceptions to the application of this procedure are made as long as they are approved by the Head of Division concerned.</p> <p>For every document request, external parties are required to fill out an information request form (FM-SAG-HO-CA&L-080002) as proof of providing information by the work unit and documented in the work unit and/or are required to submit the request officially and in writing.</p> <p>The document listed above are made publicly through stakeholder consultation (meeting), available prior request, upload on website of Sampoerna Agro (www.sampoerna-agro.com), or by requested by relevant stakeholders.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia has defined the procedure on mechanisms and responding to requests for information in accordance with the P-SAG-HO-CA&L-08 procedure, 2nd revision dated 1 February 2016 concerning Communication, Participation and Consultation.</p> <p>PT Usaha Agro Indonesia has shown the information has been received in the appropriate form and language for relevant stakeholders (provided in Bahasa Indonesia).</p> <p>Based on interview with sample of interested parties (e.g.: Head of Jambi Village, Sukaramai Village, <i>LKS Bipartit</i>, and local governance in Ketapang Regency), they have well awareness of the type of information and how to get access to the information as gained during stakeholder consultation and onsite interview with workers.</p>	Complied

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		<p>Company has provided information to stakeholder through submission of mandatory report to related agency, such as:</p> <ul style="list-style-type: none"> • The Hazardous waste report for semester 1 of 2023 was reported on October 18 2023, sending documents via post. • RKL RPL Implementation Report Semester 1 of 2023, sent to Environment Agency of Kalimantan Barat Province with Letter Number 36/SUS/XI/2023 dated 01 November 2023. 	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia has shown the procedure on communication with relevant stakeholders as per "<i>IMS Procedure Komunikasi, Partisipasi, dan Konsultasi</i>, document no. P-SAG-HO-CA&L-08 procedure, 2nd revision dated 1 February 2016 concerning Communication, Participation and Consultation. The procedure has approved by CEO and written in Bahasa Indonesia.</p> <p>The procedure has explained that:</p> <ul style="list-style-type: none"> • Timeframe for response to request for information has stated in the procedure as sighted on article no. 7.1 (external communication) point 3.f.: "the head of unit/department provided a response to stakeholder at least 14 days after information/request received". • The persons in charge (PIC) for receiving and responding the request from stakeholder have been defined in the procedure no. P-SAG-HO-CA&L-08, revision 2, dated February 01, 2016. The PIC as sighted on the procedure as follow: <ul style="list-style-type: none"> - Head of each unit (estate, POM, & laboratory) have responsible to received and recorded of suggestion and/or input from internal and external parties who come directly (via verbally) or in writing and submit them to the head of the department. - CA&L department delivers relevant significant legal and social information to internal and external parties in accordance with regulation and company policy. 	Complied

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		<ul style="list-style-type: none"> - Human Resources & Services: deliver relevant and significant employment information to internal and external parties in accordance with regulations and company policy. - The unit of sustainability has responsibility to deliver information of quality, H&S, environmental and food safety to relevant internal and external parties. <p>During ASA-1.1, PT Usaha Agro Indonesia has demonstrated the evidence of records of information requested, and responses are maintained as sighted on the document "Logbook Komunikasi Stakeholder", document no. LB-SAG-HO-CA&L-080001.</p> <p>Record and provide responses to every recorded request for information received from both employees and external parties into the "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).</p> <p>Based on interviews with representatives of Jambi Village, it is known that the company has conducted outreach to the village regarding the mechanism for requesting information from the company. If there is a request for information, the village will send a letter to the company and the company will respond.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>The company has procedure for consultation and communication between the company and relevant stakeholders that is procedure of <i>Komunikasi, Partisipasi dan Konsultasi</i> No. PSAG-HO-CA&L- 08 Rev. 4, August 01, 2019, signed by Chief Executive Officer. The procedure has written in Bahasa Indonesia.</p> <p>In that procedure, Estate Manager and CA&L Department is the PIC who responsible to communication and consultation with relevant stakeholders.</p>	Complied

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		<p>The company shows the Minutes of the socialization of communication, participation and consultation procedures (P-SAG-HO-CA&L-08) and the flow of communication and consultation delivery with stakeholders (Stakeholder Logbook) which was carried out on 24 and 28 August 2023, which was attended by Ulin Agro Estate workers , Meranti Agro Estate, and Keruing Agro Estate.</p> <p>Based on interview with community representative of Jambi Village, confirmed they aware of establish procedure and know how to contact PIC by phone or official letter. Input from stakeholders recorded and used to improvement the procedure.</p>	
1.1.5	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia has shown the document list of contact and detail of stakeholders and their nominated representatives as per "Daftar Stakeholder PT Usaha Agro Indonesia" updated in 01 February 2024.</p> <p>The information in the list includes institution's name, address, contact person & position, phone numbers person, i.e:</p> <ul style="list-style-type: none"> • Local governance of Ketapang Regency. • Local governance of Manis Mata District. • Local governance of Village (Jambi Village, Sukaramai Village, Danau Buntar Village). • <i>Koperasi Kemitraan</i> • Gender Committee • Contractor • NGO <p>Based on verification with several stakeholders mentioned above, confirmed the listed contacts exist.</p>	Complied
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			

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1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>The unit of certification has a code of ethical conduct policy in all operations and transactions, including recruitment and contracts recorded in <i>Kebijakan Keberlanjutan PT Sampoerna Agro Tbk</i>, signed by chief executive officer on 1 April 2023. The policy stipulated commitment for integrity and ethical conduct in all transaction and business operation in line with Sampoerna Way. Comply to appropriate business practice, prohibit all form of corruption and other abuse of resources, as well as information transparency in compliance with relevant legal regulation.</p> <p>The policy has been communicated to all levels of the workforce and operations, including contracted third parties and relevant stakeholders on 17 February 2024 and 16 March 2024. Minutes of meeting, list of attendees and photo documentation can show by the company.</p> <p>The code of conduct policy is included in the contractual agreement with contractors. The company shows a Work Agreement Number 004/SPK-LKL/UAI-KAE/III/2024 between the Estate Manager of KAE PT UAI and Melda as the Contractor, with a validity period of 01 to 25 March 2024, type of pruning work in Division 3 Keruing Agro Estate. Chapter 12 stipulated contractor shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment.</p> <p>Based on interview with sampled worker in UAI POM, they understand the implementation of ethical conduct in their daily activity: no cheating with weighbridge scale; no mark up in maintenance work, no abuse in use of resources and fund.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>The company has a violation reporting policy of PT Sampoerna Agro Tbk which was ratified by the President Director on September 27, 2013. The purpose of this policy is as a concrete manifestation that the</p>	Complied

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		<p>company group upholds accountability and transparency as well as a concrete effort to improve the quality of plantation company governance. which is good for supporting the business activities of the group company. This policy explains the Whistle Blowing System (WBS), which is a violation reporting system that is part of the group's internal control system in preventing violation and fraudulent practices and to strengthen the implementation of good corporate governance.</p> <p>All reports must be submitted to the WBS team by electronic mail or written letter:</p> <ul style="list-style-type: none"> • If submitted by electronic mail or email, the report is addressed to: complaints@sampoernaagro.com • If submitted by mail (in a closed envelope), which is marked as Private and strictly confidential: complaint from SGRO PT Sampoerna Agro Tbk. Sampoerna Strategic Square North Tower, 28th floor Jl. Jend. Sudirman Kav. 45 Jakarta 12930, Indonesia. <p>Besides that, to monitor compliance with ethical policies is carried out through internal audit and monitoring complaints. From the results of the verification of the complaint document and interview with management and stakeholders known that there were no complaints related to violations of ethical behavior.</p> <p>In addition, the company also routinely conducts internal audits every year covering aspects of the RSPO including ethical behavior. And from the results of the internal audit conducted, there is no indication of a violation of ethical behavior.</p>	
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			

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2.1.1	<p>(C) The unit of certification complies to relevant regulations.</p> <p>- Critical (Major) compliance -</p>	<p>The company has complete list of legal requirements covered OHS, Environmental, Plantation and other relevant legal requirements and last updated on 21 July 2023. The company has demonstrated its compliances to legal requirements e.g.:</p> <ul style="list-style-type: none"> • Location Permit issued in 2010: As per "Keputusan Bupati Ketapang No.414 Tahun 2010 tentang Revisi Perpanjangan Izin Lokasi Pembangunan Perkebunan Kelapa Sawit dan Pabrik Pengolahan Atas Nama PT. Usaha Agro Indonesia" dated 27 July 2010. Area allocated for PT. Usaha Agro Indonesia has been revised and extended for 11,300 Ha in Manis Mata and Kendawangan Regency. • Land title "Sertifikat HGU No.108 PT. Usaha Agro Indonesia" dated 24 June 2015 for 2,465.74 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00108. Completed with map scale 1:50000. • Plantation business permit as per "Keputusan Bupati Ketapang No.334/DPMPTPSP-D/200 tentang Perubahan Keputusan Bupati Ketapang No.913/DISBUN-D/2016 Tentang Izin Usaha Perkebunan PT. Usaha Agro Indonesia" dated 29 September 2020. Commodity oil palm; total area 12,840 Ha; processing capacity 90 MT FFB/hour. 	Complied
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p> <p>- Minor compliance -</p>	<p>The company has a documented system, which includes written information on legal requirements, the system is maintained in SOP Integrated Management Procedure "<i>Identifikasi dan Evaluasi Peraturan Perundangan dan Persyaratan Lainnya</i>" or (Identification and Evaluation of Law Regulation and Other Requirements) document No. P-SAG-HO-SUS-06, Rev. 3, dated on 1 September 2017. The procedure was included the information of:</p> <ul style="list-style-type: none"> - Personnel in charge to manage. - Set of legal documents. 	Non-compliance

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		<ul style="list-style-type: none"> - Comprehensive list of international, national, sub-national and provincial laws which details the requirements of specific to the mill and estate operations. - Relevant sections within the law that is identified and linked to activities. <p>The mechanism for ensure compliance of legals and requirements has been explained in SOP No. P- SAG-HO-SUS-06 as stated on point 7.5: company will conduct law and regulation compliance once a year.</p> <p>The company demonstrated an <i>Evaluasi Pemenuhan UU dan Peraturan K3, Lingkungan, Perkebunan dan Syarat Lainnya</i> for Mill and Estate on 21 July 2023. The results of this evaluation showed that there were regulations and laws that were declared not fulfilled, for example (but not limited to):</p> <ul style="list-style-type: none"> • PT.UAI's P2K3 structure is in the process of being ratified by the Manpower and Transmigration Office of Ketapang Regency according to letter No./PT.UAI-EXT/PP/VI/2023 and the <i>SKP</i> for the Appointment of OHS Experts has expired on 29 January 2024. • First aid officers have not received first aid training and certification from the relevant agencies. • Clinic Operational Permit at PT UAI from <i>DPMPPTSP</i> Ketapang Regency No. 017/DPMPPTSP-D/2018 dated 15 January 2018 has expired as of 15 January 2023. • Testing and/or calibration of medical devices has not been carried out regularly at least once a year. <p>And from the results of field visits at Mill and interviews with workers, it is known that sterilizer operators, engine room operators, electrical</p>	
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		<p>operators, wheel loader operators, welders and waste operators do not yet have OHS licenses and competency certificates. Furthermore, based on the verification of the <i>Posisi Tenaga Kerja PKS</i> document as of 01 February 2024 which is shown, with the following information: 2 sterilizer operators, 2 boiler operators, 1 engine room operator, 1 electrical engineer, 2 heavy equipment operators, 2 welders, and 2 waste operators.</p> <p>In relation to the information above, the company further shows the following:</p> <ul style="list-style-type: none"> • Certificate Number 5/1402091222/AS.01.04/XII/2022 dated 09 December 2022 in the name of Sandi (Class I Operator). • Certificate Number 563/13/UPT.LKI-3 dated 30 December 2019 in the name of Yusuf Subagio (SMAW 3G Welder) • Certificate Number 14066/OPK3/PAA-LT/X/2017 dated 06 October 2017 in the name of Revi Susanto (wheel loader operator), has expired. <p>Referring to applicable laws and regulations, there are personal requirements that must have an OHS license and competency certificate, for example (but not limited to):</p> <ul style="list-style-type: none"> - <i>Permenaker No. 01 Tahun 1988 Kualifikasi dan Syarat - Syarat Operator Pesawat Uap</i> - <i>Permenaker No. 38 Tahun 2016 K3 Pesawat Tenaga dan Produksi</i> - <i>Permenaker No. 12 Tahun 2015 K3 Listrik di Tempat Kerja & Permenaker No. 33 Tahun 2015 Perubahan atas Permenaker No. 12 Tahun 2015 K3 Listrik di Tempat Kerja</i> 	
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		<ul style="list-style-type: none"> - <i>Permenakertrans No. 09 Tahun 2010 Operator dan Petugas Pesawat Angkat Angkut</i> - <i>Permenakertrans No. 02 Tahun 1982 Kualifikasi Juru Las</i> - <i>PerMenLHK No. 05 Tahun 2018 Standar dan Sertifikasi Kompetensi Penanggung Jawab Operasional Pengolahan Air Limbah dan Penanggung Jawab Pengendalian Pencemaran Air</i> - <i>PerMenLHK No. 06 Tahun 2018 Standar dan Sertifikasi Kompetensi Penanggung Jawab Operasional Instalasi Pengendalian Pencemaran Udara dan Penanggung Jawab Pengendalian Pencemaran Udara</i> - <i>PerMenLHK No. 06 Tahun 2021 tentang Tata Cara Pengelolaan Limbah B3</i> <p>The company has not been able to show sufficient evidence that the company has a documented system to ensure legal compliance is fulfilled and has been followed up.</p>	
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2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	<p>Boundary poles in PT. Usaha Agro Indonesia sampled from Kruing Agro Estate, Meranti Agro Estate, Ulin Agro Estate, Scheme Smallholder Estate:</p> <table><tr><th>Description</th><th>Longitude</th><th>Latitude</th></tr><tr><td>UAI017 boundary with PT. KPAM; Kruing Estate nearest block Q39</td><td>2° 42' 53.77" S</td><td>111° 02' 40.96" E</td></tr><tr><td>UAI041 boundary with PT. MSL; Kruing Estate block M26</td><td>2° 40' 55.17" S</td><td>110° 59' 30.93" E</td></tr><tr><td>UAI150 boundary with PT. ISK; Meranti Estate block C15</td><td>2° 34' 47.57" S</td><td>110° 55' 21.43" E</td></tr><tr><td>UAI001 boundary with PT. ISK; Meranti Estate block C13</td><td>2° 34' 27.63" S</td><td>110° 55' 31.02" E</td></tr><tr><td>UAI010 boundary with PT. MSL; Meranti Estate block E16</td><td>2° 34' 59.96" S</td><td>110° 57' 03.29" E</td></tr><tr><td>UAI012 boundary with PT. MSL; Meranti Estate block E20</td><td>2° 35' 39.92" S</td><td>110° 57' 03.93" E</td></tr></table> <p>Mechanism for maintenance of boundary markers has been established as seen on Procedure of <i>Pembuatan dan Perawatan Patok HGU</i> document no. WI-SAG-KBN-PML-0206, revision 01, dated September 01, 2017. The document mentioned that boundary pillars monitoring shall carry out yearly with clearing activity in around of boundary markers, repainting the boundary pillars and replace the boundry markers if missing.</p> <p>Field observation verified: Keruing Agro Estate:</p>	Description	Longitude	Latitude	UAI017 boundary with PT. KPAM; Kruing Estate nearest block Q39	2° 42' 53.77" S	111° 02' 40.96" E	UAI041 boundary with PT. MSL; Kruing Estate block M26	2° 40' 55.17" S	110° 59' 30.93" E	UAI150 boundary with PT. ISK; Meranti Estate block C15	2° 34' 47.57" S	110° 55' 21.43" E	UAI001 boundary with PT. ISK; Meranti Estate block C13	2° 34' 27.63" S	110° 55' 31.02" E	UAI010 boundary with PT. MSL; Meranti Estate block E16	2° 34' 59.96" S	110° 57' 03.29" E	UAI012 boundary with PT. MSL; Meranti Estate block E20	2° 35' 39.92" S	110° 57' 03.93" E	Complied
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		<ul style="list-style-type: none"> - Pole No. 041 2° 40' 54.99" S and 110° 59' 30.70" E, bordering with community land of Jambi Village. - Pole No. 039 2° 40' 55.56" S and 110° 59' 2.25" E, bordering with community land of Jambi Village. - Pole No. 181 2° 40' 23.38" S and 110° 57' 58.84" E, bordering with community land of Jambi Village. <p>Koperasi Perkebunan Sempurna Mandiri:</p> <ul style="list-style-type: none"> - Pole No. 123 2° 38' 11.52" S and 110° 57' 17.00" E. - Pole No. 124 2° 38' 11.44" S and 110° 57' 8.55" E. - Pole No. 130 2° 38' 7.97" S and 110° 56' 23.01" E. <p>Meranti Agro Estate:</p> <ul style="list-style-type: none"> - Pole No. 139 2° 37' 14.85" S and 110° 55' 4.12" E. - Pole No. 144 2° 35' 50.24" S and 110° 54' 50.96" E. - Pole No. 146 2° 35' 47.14" S and 110° 55' 20.73" E. <p>Koperasi Perkebunan Sempurna Bersatu:</p> <ul style="list-style-type: none"> - Pole No. 15 2° 32' 37.26" S and 110° 57' 5.93" E. - Pole No. 175a 2° 34' 9.69" S and 110° 56' 36.02" E. - Pole No. 176a 2° 34' 9.54" S and 110° 56' 47.24" E. <p>It is known that HGU boundaries are maintained and clearly visible and no indications of cases of boundary violations or excess planting.</p>	
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			

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2.2.1	<p>A list of contracted parties is available.</p> <p>- Minor compliance -</p>	<p>There is evidence that each site has list of contracted party included contractor FFB transport, EFB transport, civil contractor, mill equipment contractor etc.</p> <p>Keruing Agro Estate, period of December 2023 to January 2024</p> <table border="1"> <thead> <tr> <th>Name of Contractor</th><th>Address</th><th>Contract</th><th>Work Scope</th></tr> </thead> <tbody> <tr> <td>Gow Kwe Fii</td><td>Jambi Village</td><td>001/SPK-LKL/UAI-KAE/I/24</td><td>Goods Transport</td></tr> <tr> <td>Wahyu Nugroho</td><td>Sukaharja Village</td><td>002/SPK-LKL/UAI-KAE/I/24</td><td>FFB Transport</td></tr> <tr> <td>Agus Saputra</td><td>Jambi Village</td><td>016/SPK-LKL/UAI-KAE/I/24</td><td>Pruning</td></tr> <tr> <td>Nasrun Hidayat</td><td>Jambi Village</td><td>029/SPK-LKL/UAI-KAE/I/24</td><td>Piringan Manual</td></tr> <tr> <td>Khanipudin</td><td>Majalengka</td><td>033/SPK-LKL/UAI-KAE/I/24</td><td>Gawangan Manual</td></tr> </tbody> </table> <p>Ulin Agro Estate, period of December 2023 to January 2024</p> <table border="1"> <thead> <tr> <th>Name of Contractor</th><th>Address</th><th>Contract</th><th>Work Scope</th></tr> </thead> <tbody> <tr> <td>Trivena</td><td>Jambi Village</td><td>015/UAI-UAE/SPK-LKL/I/24</td><td>FFB Transport</td></tr> <tr> <td>Safarudin</td><td>Jambi Village</td><td>012/UAI-UAE/SPK-LKL/I/24</td><td>FFB Transport</td></tr> <tr> <td>Dina</td><td>Jambi Village</td><td>010/UAI-UAE/SPK-LKL/I/24</td><td>FFB Transport</td></tr> <tr> <td>Ardian</td><td>Jambi Village</td><td>021/UAI-UAE/SPK-LKL/I/24</td><td>POME Application</td></tr> <tr> <td>Gou Kwek Fi</td><td>Jambi Village</td><td>206/UAI-UAE/SPK-LKL/I/23</td><td>Pruning</td></tr> </tbody> </table>	Name of Contractor	Address	Contract	Work Scope	Gow Kwe Fii	Jambi Village	001/SPK-LKL/UAI-KAE/I/24	Goods Transport	Wahyu Nugroho	Sukaharja Village	002/SPK-LKL/UAI-KAE/I/24	FFB Transport	Agus Saputra	Jambi Village	016/SPK-LKL/UAI-KAE/I/24	Pruning	Nasrun Hidayat	Jambi Village	029/SPK-LKL/UAI-KAE/I/24	Piringan Manual	Khanipudin	Majalengka	033/SPK-LKL/UAI-KAE/I/24	Gawangan Manual	Name of Contractor	Address	Contract	Work Scope	Trivena	Jambi Village	015/UAI-UAE/SPK-LKL/I/24	FFB Transport	Safarudin	Jambi Village	012/UAI-UAE/SPK-LKL/I/24	FFB Transport	Dina	Jambi Village	010/UAI-UAE/SPK-LKL/I/24	FFB Transport	Ardian	Jambi Village	021/UAI-UAE/SPK-LKL/I/24	POME Application	Gou Kwek Fi	Jambi Village	206/UAI-UAE/SPK-LKL/I/23	Pruning	Complied
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2.2.2	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>The company shows a list of contractors, where there are contractors who provide labor services (outsourcing) on behalf of individuals (head of contract), for example:</p> <ul style="list-style-type: none"> • Agus Saputra (pruning) • Nasrun Hidayat (<i>piringan manual</i>) • Khanipudin (<i>gawangan manual</i>) • Ardian (POME application) • Gou Kwek Fi (pruning) <p>The company shows a Work Agreement Number 004/SPK-LKL/UAI-KAE/III/2024 between the Estate Manager of KAE PT UAI and Melda as the Contractor, with a validity period of 01 to 25 March 2024, type of</p>	Non-compliance																				

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		<p>pruning work in Division 3 Keruing Agro Estate. In the agreement the following requirements are required:</p> <ul style="list-style-type: none">• Article 8, the contractor is fully responsible for the safety of the workers being worked on and everything related to ASTEK as well as all work incidents/accidents that occur while the contractor is carrying out work.• Article 12 point (2) contractors are child labor is prohibited or workers resulting from human trafficking crimes.• Article 12 point (3) contractors are obliged to comply with and implement all statutory regulations in the field of OHS. <p>In the contract attachment, there is a list of names of Melda contractor workers, including: Mane Ardiansah, Nia Astuti, Menggap, Iwan Irawan, Umar, Juni. The age of the youngest worker is 21 years and the oldest is 43 years.</p> <p>Results of interviews with contractors on behalf of Melda (not on the list of contractors) as labor providers (outsourcing) for pruning activities in Division II KAE (in February 2024) and in Division III KAE (in March 2024). The contractor is in the name of an individual and is not yet a legal entity with a total of 16 workers. The applicable wage provisions are the price to the agreement with the worker. Workers have not insurance registered with <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>.</p> <p>Public consultations with the Ketapang Regency Manpower and Transmigration Agency stated that for companies that use third party workers (outsource), they must refer to applicable regulations, for example the contractor has a legal entity, workers are registered with <i>BPJS Ketenagakerjaan</i> for at least 2 programme (<i>Jaminan Kecelakaan Kerja</i> and <i>Jaminan Kematian</i>).</p>	
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		<p>As regulated in Minister of Manpower Regulation No. 11 of 2019 concerning the Second Amendment to the Regulation of the Minister of Manpower and Transmigration Number 19 of 2012 concerning Requirements for Handing over Part of the Work to Another Company, it states that:</p> <ul style="list-style-type: none"> • Article 20: The Worker/Labourer Service Provision Agreement must be registered by the Worker/Labourer Service Provider at the agency responsible for the employment sector of the Regency/city where the work is carried out • Article 21: In the event that the work agreement for the provision of labor/labour services meets the requirements of the agency responsible for issuing proof of registration no later than 3 (three) working days after the complete application is received. • Article 24: Every company providing worker/labor services is required to have a business license to provide worker/labor services. Have a business registration number issued by the OSS Institution <p>Minister of Manpower Regulation 35 of 2021 Article 20 Outsourcing Companies must be legal entities and must comply with business permits issued by the Central Government.</p> <p>Based on the explanation above, the company has not been able to show sufficient evidence that it has an effective documented system to ensure legal compliance of all contracted third parties.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>There is evidence that the contractual agreement with third party contain clauses disallowing child, forced and trafficked labour to be employed by the third party, as seen on document Contractor Hadi Sucipto and PT. Usaha Agro Indonesia (Meranti Agro Estate) has "Surat Perjanjian Kerja (SPK) No.005/UAI-MAE/SPK-LKL/I/2024" signed by</p>	Complied

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		<p>both parties on 02 January 2024 for the work of FFB transport, with the validity period of the agreement until 30 June 2024. Article 10 states as follows:</p> <ul style="list-style-type: none"> - Contractors are required to submit a list of workers and a photocopy of the workers' personal identification. - Contractors are prohibited to employ underage worker and workers resulting from criminal acts of human trafficking. - Contractors are obliged to comply with and implement statutory regulations in the field of OHS. - Contractors must comply with legal provisions and regulations in the environmental sector. 	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p>	<p>UAI POM receives FFB's from directly sources from own estate and others out grower:</p> <p>Certified FFB are sourced from:</p> <ul style="list-style-type: none"> - Ulin Agro Estate - Kruing Agro Estate - Meranti Agro Estate - Koperasi Kebun Jambi Mekar Jaya Sempurna (scheme smallholders) - Koperasi Kebun Sempurna Mandiri Estate (scheme smallholders) <p>Whilst non-certified FFB are coming from:</p> <ul style="list-style-type: none"> - PT Anugrah Palembang Indonesia (APIN) - Koperasi Perkebunan Sempurna Bersatu (scheme smallholders) - Rudi (outsider FFB suppliers) - Ulin Agro Estate (new planting sanctions non-NPP) - Kruing Agro Estate (new planting sanctions non-NPP) - Meranti Agro Estate (new planting sanctions non-NPP) 	Complied

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		<div>- PT Karya Prima Agro Mandiri (KPAM)</div> <div>Information regarding geolocation and land status of FFB sources for out grower are available in place.</div>																																																	
2.3.2	<div>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.</div> <div>- Minor compliance -</div>	<div>Based on document "Daftar Pemasok TBS ke PKS UAI periode 2023/2024" and information from the unit of certification management, there is no indirect supplier which supply FFB to UAI POM.</div>	Complied																																																
<div>Principle 3: Optimise productivity, efficiency, positive impact and resilience</div> <div>Implement plans, procedures and systems for continuous improvement.</div>																																																			
<div>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</div>																																																			
3.1.1	<div>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</div> <div>- Critical (Major) compliance -</div>	<div>PT Usaha Agro Indonesia prepared Business Plan 2024-2028, updated in 2024, explaining the Legal Aspects, Business Location, Company capital assets, Management, Estate and Mill Profile, Production of FFB, CPO and PK, Transportation, CSR Program, Environmental and social impact, Marketing, SWOT analysis, and Finance History.</div> <div>Estimated Production of FFB, CPO and PK 2024-2028:</div> <table><tr><th>Description</th><th>2024</th><th>2025</th><th>2026</th><th>2027</th><th>2028</th></tr><tr><td>FFB Production (Ton)</td><td>164,542</td><td>189,757</td><td>198,927</td><td>205,121</td><td>204,232</td></tr><tr><td>Yield (Ton/Ha)</td><td>19.2</td><td>22.2</td><td>23.2</td><td>23.4</td><td>23.2</td></tr><tr><td>FFB processed (Ton)</td><td>177,646</td><td>210,218</td><td>222,828</td><td>233,714</td><td>234,749</td></tr><tr><td>CPO (MT)</td><td>43,474</td><td>51,592</td><td>54,371</td><td>56,645</td><td>55,796</td></tr><tr><td>PK (MT)</td><td>7,994</td><td>9,460</td><td>10,027</td><td>10,517</td><td>10,564</td></tr><tr><td>OER (%)</td><td>24.47</td><td>24.54</td><td>24.40</td><td>24.24</td><td>23.77</td></tr><tr><td>KER (%)</td><td>4.50</td><td>4.50</td><td>4.50</td><td>4.50</td><td>4.50</td></tr></table>	Description	2024	2025	2026	2027	2028	FFB Production (Ton)	164,542	189,757	198,927	205,121	204,232	Yield (Ton/Ha)	19.2	22.2	23.2	23.4	23.2	FFB processed (Ton)	177,646	210,218	222,828	233,714	234,749	CPO (MT)	43,474	51,592	54,371	56,645	55,796	PK (MT)	7,994	9,460	10,027	10,517	10,564	OER (%)	24.47	24.54	24.40	24.24	23.77	KER (%)	4.50	4.50	4.50	4.50	4.50	Complied
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		<p>Unit of certification demonstrated independent financial audit report for the year that ended on 31 December 2022. Based on the report, the financial statements presents that the company booked profit 29.63% compare to previous year. Next audit for financial statement will be conducted in June 2024 for financial year ended December 2023.</p> <p>The long-term management plan includes scheme smallholder area which is fully operated by the company. The business plan has been approved by Top Management in 2024.</p>	
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Annual replanting programme for 5 years is made available in the company's Rencana Bisnis 2024-2028 document. Based on the document, no replanting activity will take place in the next 5 years (up to 2028). Based on year of planting, the oldest oil palms are planted in 2006, therefore the shortest replanting will be conducted in 2031. Latest yearly review made on available in business plan document. The document has included production history since 2019 to 2023 as consideration for replanting activity.</p>	Complied
3.1.3	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>Management review (<i>Rapat Tinjauan Manajemen</i>) as per specified by the company's Memorandum 081/SUS/X/2022, is to be conducted once a year.</p> <p>The latest management review has been conducted on 21 December 2023, via online and physical meeting (hybrid), which was attended by all top management of the company (Chief Operating Officer) and all related personnel with total 76 participants. Management review lead by Head of Sustainability, Mr. Bona Ranto Pasaribu. Based on the management review meeting record, internal and external audit result 2023 for all certification standards are discussed (RSPO, ISPO and IMS).</p> <p>Other issues discussed and presented are follow up action regarding the previous management review result, progress of certification and sustainability area Kalimantan & Sumatera, procurement, Human Resources, marketing, CSR, human resources, tenurial and</p>	Complied

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		improvement recommendation. Some, follow up action are verified as closed whilst others are still in progress or continually implemented.	
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The company's top management has defined policy, set objectives, define processes needed and provided resources to achieve the objectives. Actions plan for continual improvement have been defined in order to optimising yield of the supply base, reduction of use of pesticides, environmental impacts, reduction waste, protection of environmental, prevention of pollution, GHG, impacts on communities, workers and smallholders, peatland and other conservation areas. The action plan included the PIC for implementing and monitoring. Records of the implementation for example:</p> <ul style="list-style-type: none"> • Record of pesticide use • Records of environmental monitoring and measurement • Records of GHG emission • Records of HCV-HCS monitoring <p>Continual Improvement Plan has been determined in Business Plan 2023 – 2027, covered consideration of the main social and environmental impact and opportunities of the unit of certification. Continuous improvement plan includes:</p> <ul style="list-style-type: none"> • Increase quality and services of communities' education. • Increase access and service of health. • Increase local communities' income. • Increase quality of environment. • Strengthen capacity of communities' institution. 	Complied

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		<ul style="list-style-type: none"> • Preservation of communities' socio-cultural. <p>The organization has implemented effective mechanism to monitor effectiveness of the implementation of plan, for example by conduct internal audit and management review (see documents of Audit Internal RSPO PT Usaha Agro Indonesia dated 16 to 22 February 2024, and <i>Notulen Rapat Tinjauan Manajemen</i> dated 21 December 2023, signed by Head of Sustainability)</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>The company has shown the RSPO Version 2.1 metric template which has been filled in according to the facts and data in the company's record documents, such as the number of workers, production area to work accident records. Based on document verification, for the RSPO metric template it is known that annual data for a period of 12 months will be used in 2023 for the schedule for reporting annual social and environmental data, including data on water consumption monitoring, HCV management and monitoring.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has List of applicable SOPs related to mill and plantation operation, listed in "Daftar Dokumen Kebun" for plantation operation and "Daftar Dokumen PKS" (FM-SAG-HO-SUS-01004), updated January 2024. The SOPs found adequately cover all estate and mill processes and activities, e.g.:</p> <ul style="list-style-type: none"> • Estate: Land Preparation, Blocking, Land Clearing, Planting LCC, Water and Soil Conservation, Maintenance of Terrace and Ditch, Road and Bridge Development, Nursery, Planting Oil Palm, Weeding, Integrated Pest Management, Fertilizing, Harvesting, FFB Transport, Water Management, Replanting, road and bridge maintenance, Pest 	Complied

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		<p>monitoring, Emergency Response, HCV Identification, Management and Monitoring (P-SAG-KBN-PML-01 until P-SAG-KBN-PML-30).</p> <ul style="list-style-type: none"> • Mill: Weighing, Loading Ramp, Sterilizer, Thresher, Presser, Clarification, Kernel Recovery, Boiler, Machine Room, Water Treatment, Final Effluent Treatment, Buch Ash, Composting, Traceability & Mass Balance, Maintenance & Repair, Process Analysis, Emergency Response, Hazardous Material & Waste Handling, Biogas Plant. <p>Based on interview with workers, obtain information that all workers at relevant estate and workstation have been briefed with the SOP prior to start working on regular basis. The SOP is made available for reference at the estate and mill's office. The procedures are established in Bahasa Indonesia.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>Mechanism to check consistent implementation of procedures observed based on several record such as:</p> <ul style="list-style-type: none"> - "Laporan Hasil Assessment Mutu ancah dan mutu buah – Score Mutu Buah & Mutu Ancah" – Agronomy Continual Improvement, report described assessment result and scoring of FFB and block location quality. Assessment conducted monthly. Sample seen for assessment report period January and February 2024 for Ulin Agro Estate, Keruing Estate and Meranti Estate. - "Hasil Verifikasi PMA (Pemeriksaan Mutu Buah) dan PMB (Pemeriksaan Mutu Buah) Asisten Divisi", report described verification result of palms checked, palms harvested, unharvested bunch, unpicked bunch, unpicked loose fruit and total loose fruit. Verification conducted daily by sampling in each division; sample seen for period February and March 2024 for Ulin Agro Estate, Keruing Estate and Meranti Estate. 	Complied

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		<ul style="list-style-type: none"> - Mill assessment based on "Assessment Mill Usaha Agro Indonesia", report described assessment result of Loading Ramp, Sterilizer, Thresher, Press Station, Clarification Station, Storage Tank, Kernel Station, Storage Tank, Kernel Bulking Silo, Final Effluent, Boiler, Engine Room, Water Treatment, Laboratories and Workshop. Assessment conducted bimonthly. Sample seen for record of assessment period January 2024 for UAI Mill. - Operational internal audit, e.g. report No.018/IA-RTN/2023 dated 13 April 2023; visit date 7 – 12 March 2023. Report described aspect: Land Clearing & nursery, upkeep and fertilizing, harvesting and FFB transport, finance, supplies and procurement, fixed asset, salary and human resources. Operational internal audit conducted once a year by internal audit dept. 	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>A robust system for maintaining operational records and taking necessary actions is in place. This includes documents like the Operational Internal Audit Report (No.018/IA-RTN/2023 dated 13 April 2023) to ensure accountability and transparency.</p> <p>The master list for all Standard Operating Procedures (SOPs) is readily available, as outlined in section 4.1.1. Any changes or revisions made to these SOPs are meticulously recorded in the Document Register (FM-SAG-HO-SUS-010004). It's noteworthy that the SOPs are established in the local language (Indonesian), making them accessible to all.</p> <p>The estates maintain an ongoing monitoring system to oversee procedure implementation. Daily work activities are meticulously planned on both monthly and daily bases, with records maintained in the Daily Planning Book (<i>Rencana Kerja Harian</i>). Supervisors or Mandors for each workstation diligently update the supervisor's logbook - "<i>Buku Kerja Mandor</i>" on a daily basis. During audit it was verified sample of Rencana Kerja Harian and Buku Kerja Mandor Period February and March 2024.</p>	Non-compliance

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		<p>Information recorded in the supervisor's logbook is extracted to compile the Manager Monitoring Report, which is prepared by the Chief Admin on a monthly basis. This report undergoes review by the Estates Manager and General Manager before being submitted to the Operation Management Support at the head office. Routine monitoring and supervision of SOP implementation by workers are carried out daily by Field Assistants, with monthly verification by the Agronomic Continuous Improvement unit.</p> <p>All SOP implementations are rigorously verified by the Agronomic Continuous Improvement (ACI) unit, as evident in the Field Administration Checklist - "<i>Checklist Administrasi Kebun</i>". Examples of evidence from monitoring records observed during the audit include:</p> <ul style="list-style-type: none">- Planning and realization for continuous improvement for the years 2023 and 2024.- Daily Planning (<i>Rencana Kerja Harian - RKH</i>).- Realization, Supervisor's Logbook (<i>Buku Kerja Mandor - BKM</i>). <p>Furthermore, the Head of Assistant (ASKEP) and Field Staff have received comprehensive training on the implemented SOPs at the PT Usaha Agro Indonesia Training Centre in Sumatera Selatan. Evidence of the training attended by the assistants is documented in the PT Usaha Agro Indonesia STAR Program.</p> <p>Lastly, regular inspections of the SOP implementation are carried out by the Sustainability Department, encompassing the management system and implementation, as evident in the internal audit report conducted in 16 – 22 February 2024. These comprehensive measures ensure the continued adherence to and improvement of SOPs within PT Usaha Agro Indonesia.</p> <p>Non conformity</p>	
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		<p>During field observation in sample block of Keruing Agro Estate (L14, J9, J10, M12, M14), Koperasi Jambi Mekar Jaya Sentosa, Ulin Agro Estate (K47, N36/37), Koperasi Perkebunan Sempurna Bersatu (C28) it was found the field condition was not properly maintained such as: saplings/kentosan, weeds on palm oil circle are less control, under pruning. There is no immediate action taken to address the issue.</p> <p>CH has conducted Agoronomy Continual Improvement monthly as recorded in "Rekap Penilaian Kualitas Ancak" and "Rekap Penilaian Kualitas Buah" sample seen for period January – February 2024. There is no immediate action taken in accordance scoring result from assessment.</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>- Critical (Major) compliance -</p>	<p>Available Social & Environmental Impact Assessment (SEIA), i.e.: Analisis Dampak Lingkungan Hidup (LU-ANDAL) 2008 document (ref: no. 29) dated 16 January 2009 that has been established and undertaken through a participatory methodology which includes the affected stakeholders. The scope of SEIA was covering all aspects for the establishment and operation of the plantation as well as the mil.</p> <p>The SEIA conducted for an area totalling to 11,300 ha and addressing all impacts that may arise following to the operation of the plantation and the mill which is summarized as follows:</p> <ul style="list-style-type: none"> Major planned activities, including planting, mill operations, roads, buildings, and infrastructure. Flora and fauna. Natural ecosystems of planned developments, including whether development or expansion will increase pressure on nearby natural ecosystems. 	Complied

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		<ul style="list-style-type: none"> ○ Watercourses and wetlands. ○ Hydrology and land subsidence. ○ Soil composition and topographic, including the identification of steep slopes, marginal and fragile soils, areas prone to erosion, degradation, subsidence, and flooding. ○ Type of land to be used (forest, degraded forest, cleared land); ○ Land ownership and user rights. ○ Land use patterns. <p>Available "Addendum AMDAL PT Usaha Agro Indonesia – Perkebunan dan Pabrik Pengelolaan Kelapa Sawit, Luas 14,511 Ha (Luas IUP 12,228 Ha ditambah luas izin lokasi baru 2,283 Ha) dan Penambahan Kapasitas Pabrik dari 60 Ton TBS/Jam menjadi 90 Ton TBS/jam" 2018. The document described Social and Environment Impact Assessment for plantation and palm oil mill of PT Usaha Agro Indonesia, covering area of 14,511 Ha and mill capacity 90 Ton FFB/hour.</p> <p>Available Social Impact Assessment Report of PT Usaha Agro Indonesia by CV Greenera, February 2018. Stages of activities consist of desktop research, interview, FGD, monitoring, secondary tracing, discussion analysis, and reporting. Based on field findings of the SIA, it can be concluded that the relationship between PT Usaha Agro Indonesia (PT UAI) and the surrounding population is as follows:</p> <ol style="list-style-type: none"> 1. Stakeholders who can have a positive influence are the Village Government, BPD, LMD, Community Leaders, Religious Leaders, TPK (cooperative development team) and KUD, while neutral stakeholders are the District Government. 2. The strategy for involving TPK is to provide opportunities to play a bigger role in the partnership program between KUD and PT UAI. The strategy for involving the Village Government and Community 	
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		<p>Leaders is to be involved in every activity related to the community, from planning to evaluation. The strategy for involving BPD is to involve BPD in PT UAI's important activities related to the community. The strategy for involving the District Government, Religious Leaders, LMD and KUD is to increase capacity so that they can play a greater role.</p> <ol style="list-style-type: none"> 3. Positive impacts in the economic sector are: increasing family income, employment, opening alternative land access via plantations, and new business opportunities. Apart from that, there are also negative impacts, namely: increased expenditure, damaged roads and reduced sources of food and natural materials. 4. Positive impacts in the socio-cultural field are: increasing knowledge of new types of farming (oil palm), increasing the level of community welfare, increasing the level of community education, increasing the productivity of women as plantation workers in oil palm companies and reducing the level of migration. Apart from the positive impacts, it also has negative impacts, namely: dependence on external food sources, loss of culture in cultivating rice and secondary crops, and increasing consumptive behaviour. 5. The company has carried out CSR activities, but most of them are charitable and responsive. Apart from that, planning, publication and documentation are still not good. 6. Issues that need attention from PT UAI internally are: use of PPE, employee status, employee facilities (health checks, employee housing, and school buses), employee cooperatives and labor unions, extra fooding, pruning wages, water supply drinking and payment of salary reports. Apart from that, there are also external strategic issues, namely: low profit sharing, KUD performance, boundaries between villages, fulfilment of company promises, 	
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		<p>delays in payment of profit sharing, road damage, employment, CSR programs and water channel pollution.</p> <p>Available "<i>Laporan Pelaksanaan Kelola dan Pemantauan Dampak Sosial</i>" - Social Impact Management and Monitoring report FY 2023. Social aspects for the surrounding communities of a plantation, including an analysis of potential effects on livelihoods, and differential effects on women versus men, ethnic communities, and migrant versus long-term residents. In 2023, the unit of certification has implemented management and monitoring of several aspect such as tenurial, infrastructure, socio-culture, education, health, socio-economy and inter-company.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>Unit of certification has developed social and environmental management plan and monitoring which refer to SIA document. The documented report "<i>Laporan Rencana Kelola dan Pemantauan Dampak Sosial PT Usaha Agro Indonesia</i>", dated March 2024. The report involving participation of affected stakeholders through questionnaire method and focussed group discussion (FGD). Several aspects described in the report are Social and Culture, Tenurial, Economic, Environmental, Education, Manpower and Internal Company.</p> <p>There are two types of issues were explained in the management plan, an internal issue, and external issues. 6. Issues that need attention from PT UAI internally are: use of PPE, employee status, employee facilities (health checks, employee housing, and school buses), employee cooperatives and labor unions, extra fooding, pruning wages, water supply drinking and payment of salary reports. Apart from that, there are also external strategic issues, namely: low profit sharing, KUD performance, boundaries between villages, fulfilment of company promises, delays in payment of profit sharing, road damage, employment, CSR programs and water channel pollution.</p>	Complied

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		<p>The management plan developed by involvement of participation of affected stakeholders, particularly local resident or villagers surrounding the plantation, there are Sukaramai Village, Jambi Village, Danau Buntar Village and Sungai Buluh village.</p> <p>Stakeholder consultation for developing social management plan conducted every two (2) years. The latest consultation is on 8 March 2024 for input management plan year 2024 and 2025. Methodology used during stakeholder consultation by Focus Group Discussion (FGD). Total participants involved for inputs is 21 respondents consist of Manggala Agni, Environment Agency, Education Agency, BPBD, Plantation Agency, and company representatives.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The social and environmental management and monitoring plan is consistently implemented, with regular reviews and updates carried out through a participatory approach. This inclusive process ensures that our efforts to address social and environmental concerns remain dynamic and responsive to the needs of all stakeholders involved.</p> <p>Laboratory measurement data for surface water analysis are accessible, providing valuable insights into water quality and related parameters. The Implementation Report for the Environmental Management and Monitoring Plan (RKL-RPL) offers a comprehensive overview of company's commitment to responsible environmental practices.</p> <p>Furthermore, the Social Impact Management and Monitoring Plan Report for PT Usaha Agro Indonesia, dated March 2024, provides a detailed account of efforts in addressing and monitoring social impacts within company's operations.</p> <p>These endeavours are carried out in a participatory manner, involving stakeholders through a biennial questionnaire data collection process and focussed group discussion (FGD). This collaborative approach ensures that the perspectives and concerns of various stakeholders are considered, fostering transparency and sustainability in our practices.</p>	Complied

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		<p>Unit of Certification has consistently reported the implementation of Social and Environmental Management and Monitoring periodically in 6 months interval and reported to the Environmental Office of Ketapang Regency, West Kalimantan Province and to the Ministry of Environment and Forestry, e.g.:</p> <ol style="list-style-type: none"> 1. Report on the Implementation of RKL-RPL PT Usaha Agro Indonesia for period 1st Semester of 2023 has been submitted to the Ministry of Environment and Forestry, based on letter No.35/SUS/X/2023, dated 2 October 2023. 2. Report on the Implementation of RKL-RPL PT Usaha Agro Indonesia for period 1st Semester of 2023 has been submitted to the Environment Agency of Ketapang Regency, based on letter No.32/SUS/XI/2023, dated 1 November 2023. 	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p>	<p>The company has shown Employment procedures for recruitment, selection, hiring, promotion, retirement, and termination, such as:</p> <ul style="list-style-type: none"> • Procedure Recruitment of Daily Worker (P-SAG-ADM-KTU-04, dated 1 March 2018), Penilaian Prestasi Kerja (P-SAG-HO-HR-03, dated 1 Aug 2019) and Penyediaan Staff (P-SAG-HO-HR-01, dated 1 Sep 2017) • Procedure for retirement and termination and other matters related to employment, 'Peraturan Perusahaan PT Usaha Agro Indonesia' - that was obtained from Manpower Agency as per document Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Nomor: P/6/DISNAKERTRANS-B.500.15.12.1/I/2023 tentang Pengesahan Peraturan Perusahaan PT Usaha Agro Indonesia Periode Januari 2023 – January 2025. • Record of the employee recruitment process as follows: <ul style="list-style-type: none"> - Employee request form (FM-SR-HO-HRS-010001) 	Complied

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		<ul style="list-style-type: none"> - Evidence of follow-up from employee recruitment activities in the form of recorded communication via email - Evidence of the next follow-up from the employee recruitment process, namely a Work Call Letter. <p>Types of employments are permanent (PB/Permanent Monthly Worker and KHT/ Permanent Daily Worker) and contract (PKWT).</p> <p>The audit team has been informed that all procedures are made available upon request. Series of socialisation and training session are set to ensure awareness and knowledge on the relevant matters.</p>	
3.5.2	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>The company has implemented employment procedures and recorded on several documents below:</p> <ul style="list-style-type: none"> • Surat Perjanjian Kerja No. 056/UAI/SK/Pr/XI/2023 Tentang Promosi Karyawan. • Surat Keputusan No. 048/KAE/UAI/XI/2023 Tentang Pengangkatan Karyawan. • Surat Keputusan No. 0182/UAI/XI/2023 Tentang Pengangkatan Karyawan KHL ke KHT. • Memorandum No. 457/TS/III/2024, March 14, 2024, regarding Pengusulan Pengangkatan KHL Menjadi KHT. • Memorandum No. 0071/GJ/I/2024 dated 14 January 2024 regarding Pengangkatan KHT. <p>Based on interviews with LKS Bipartit and workers in UAI POM, UAI POM, UAE & JMJS, KAE & SM, MAE & SB, confirmed that workers were following every step of recruitment and promotion procedures.</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>- Critical (Major) compliance -</p>	<p>The company has been defined a documented policy "Kebijakan Keberlanjutan," which was signed by the Chief Executive Officer on 1 October 2019. This policy reflects the company's commitment to various objectives, including:</p> <ol style="list-style-type: none"> 1. Ensuring Workplace Safety: Emphasizing the prevention of accidents and occupational diseases resulting from unsafe conditions and actions, underlining company's dedication to employee well-being. 2. Continual Health and Safety Improvement: Demonstrating commitment to the ongoing enhancement of health and safety measures, reflecting dedication to maintaining a secure working environment. <p>These commitments underscore commitment to responsible and sustainable palm oil production, placing a strong emphasis on the welfare of workforce and environmental stewardship.</p> <p>The company establish IMS Procedure Manajemen Risiko Sistem Manajemen Terpadu (Doc No. p.SAG-HO-SUS-07, Rev. 04, 01 October 2021). The SOP containing guidance on how to identify hazards, conduct risk assessment and how to define risk control. The SOP also explained that "risk assessment will be reviewed regularly at least 1 (one) time a year and if any new process/method/material, and if work accident occurred.</p> <p>The company shows the <i>Form Analisa Risiko Operasional (ORM), Aspek Mutu, Lingkungan dan K3</i> (Doc. No. FM-SAG-HO-SU-070004, Rev.2, 01 July 2021) for KAE, UAE and MAE units made by OHS Experts, checked by the Head of the Work Unit, and approved by MR on 22 January 2024.</p>	Non-compliance
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		<p>Based on the verification results, it is known that there are estate operational activities for which hazard identification and risk assessment have not been carried out, for example (but not limited to):</p> <ul style="list-style-type: none"> • Fertilizer storage • Fuel tank • Mixing pesticide • <i>Tim Unit Semprot</i> (tank and transportation of worker) • Land Application • Hazardous waste storage • Emplacement/employee housing • Use of heavy equipment and vehicles <p><i>Form Analisa Risiko Operasional (ORM), Aspek Mutu, Lingkungan dan K3</i> (Doc. No. FM-SAG-HO-SU-070004, Rev.2, 01 July 2021) for Mill made by OHS Experts, checked by the Head of the Work Unit, and approved by MR on 31 January 2024. Based on the verification results, it is known that there are mill operational activities for which hazard identification and risk assessment have not been carried out, for example (but not limited to):</p> <ul style="list-style-type: none"> • Security • Cleaning tank • Emplacement/employee housing <p>Based on the results of a field visit to the spray work at KAE, it is known:</p> <ul style="list-style-type: none"> • Spray workers use Dump Trucks for transportation to land areas. 	
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		<ul style="list-style-type: none"> The tank used for mixing uses a fire truck, due to TUS vehicle is damage condition. When mixing chemicals there is no base so there is potential for spills and leakage. Safety Data Sheet no available. <p>From field observations at the Material Warehouse at Mill, it is known that the chemical storage area does not have emergency spill response equipment. Apart from that, there are pressure vessel tubes that are untied.</p> <p>Based on explanation above, not all activities within the scope of the Mill and Estate of PT Usaha Agro Indonesia have been risk analyzed.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Effectiveness of the H&S plan reviewed periodically during monthly P2K3 meeting. The responsible person to implement and monitor implementation of the H&S plan is Secretary of P2K3 as OHS expert.</p> <p>OHS Program in 2024</p> <ul style="list-style-type: none"> Arrangement of sanitation and cleanliness of the employee housing environment carried out every month. Monitoring of first aid kits, carried out every month. Recording of work accident reports at Estate and Mill, carried out every month. Socialization of OHS and work procedures, carried out every month. Submission for procurement of complete PPE according to purchasing/warehouse requirements and standards, carried out twice a year. 	Complied

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		<ul style="list-style-type: none"> • Socialization and supervision/monitoring of PPE use carried out every month. • Training and introduction to the contents of the first aid kit for supervisors/foremen, carried out twice a year. • Regular health checks, carried out twice a year. • Special health examination (cholinesterase and audiometry), September 2024. • Reporting and realization of OHS work program, quarterly. • Socialization and simulation of fire hazards to employees, carried out twice a year. • Routine inspection of fire extinguisher/Hydrant equipment in Estate and Mill, carried out every month. <p>In accordance with the company's OHS plan program, the following implementation has been documented by the company, for example:</p> <ul style="list-style-type: none"> • The implementation of P2K3 meetings is carried out every month by the Estate and Mill, and the implementation report has been submitted to the Provincial Manpower Office every quarter. • The company has conducted medical check-up (cholinesterase, audiometry and spirometry) on 20 & 21 November 2023 for mill and estate workers, with all results being normal. • Inspection of first aid kits has been carried out by each Estate and Mill which is carried out every month. • Monitoring of fire prevention and control facilities and infrastructure is carried out every month both at the Mill and Estate. • Periodic test checks of Production Machinery have been carried out and valid until 2024. Periodic test for Boilers, Steam separators, Nut hoppers, digesters, sterilizers, lifting equipment, BPVs, pressure 	
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		<p>vessels, etc. with the results of all inspections stating that they meet OHS requirements and then a certificate of OHS eligibility is processed based on PP No. 5 in 2021.</p> <ul style="list-style-type: none"> Based on field visit to operational in estate and mill, it was seen that the workers were wearing the appropriate PPE. All PPE was provided by the company and will be replaced if damaged by free of charge. 	
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>The company has the annual training program of 2023 and 2024 that has covered all aspects of the RSPO principles and criteria, OHS awareness, environment, as well as good agricultural and manufacturing practices. These trainings included mandatory training set by regulation and inhouse training.</p> <p>From the matrix of program has structured training name, timetable, and worker will be trained, including whole staff, workers from employee status monthly, daily employees, smallholders and contract employees, and smallholders.</p> <p>Available annual training program as documented in "Rencana Pelatihan 2024" with training detail:</p> <ol style="list-style-type: none"> Limited pesticide, planned in July 2024 Hiperkes, planned in July 2024 Lift and transport operator, planned in May 2024 First Aid Training, planned in July 2024 Fire prevention, planned in August 2024 Fire prevention officer class B, C, D, planned in August 2024 Operator certification training (Sterilizer, welder, electrical technician, Genset, pressure vessel, steam engine), planned in 2024 following the training provider. 	Complied

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3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>The unit of certification has meticulously documented a comprehensive of training activities, encompassing both mandatory regulatory requirements and internal knowledge enrichment initiatives.</p> <p>For mandatory training, records reveal that 13 individuals have been trained in accordance with regulations governing their respective roles. These roles include electricity technicians, boiler technicians, generator set technicians, first aid kit team members, heavy vehicle operators, and personnel engaged in high-altitude work.</p> <p>In addition to mandatory training, the organization has consistently invested in the professional development of its workforce through a series of internal training programs. Some notable examples of these initiatives are as follows:</p> <ul style="list-style-type: none"> - On 14 March 2024, conducted training session on best practices for pesticide spraying for pesticide operator and supervisor. - On 13 September 2023, a training session on RSPO supply chain procedures for mill personel and PIC of supply chain. - First aid training for supervisor, sustainability team and medical team on 14 March 2024 and 15 March 2024 for all estate. - Hyperkes training on July 2023 for medical team. - Boiler and Genset operator training on October and November 2023. <p>These initiatives underscore the commitment to upholding the highest standards of competence and safety across the organization, fostering a culture of continuous learning and preparedness among the workforce.</p>	Complied
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p>	<p>Unit of Certification has determined Organisation Structure on Supply Chain Certification dated 31 December 2022. During this audit ASA 1.1 there is no change in the organisation structure on supply chain certification.</p>	Complied

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	- Minor compliance -	<p>Personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) are:</p> <ol style="list-style-type: none"> 1. Mill Manager 2. Laboratory & QC Assistant – Mass Balance controlling 3. Head of Laboratory & QC – Delivery and Sounding Palm Product 4. Production Administration – Mass Balance Reporting 5. Administration Head – Controlling and Monitoring Report 6. Head of Security – FFB Entering/Receiving 7. Weighbridge Operator – Weighing input. <p>Appropriate training has been provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS), such as receiving station, weighing station, administration (record keeper). Training is specific and relevant to the task(s) performed. The latest training of RSPO Supply Chain Certification conducted on 13 September 2023. Attendance list, training material and photograph are available. Training deliver by Mr. Ilham (Certification Coordinator).</p>	
Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<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</p>	<p>PT Usaha Agro Indonesia Palm Oil Mill (UAI POM) is implementing RSPO Supply Chain Module Mass Balance. During audit ASA1.1 there is no change in the supply chain module implemented.</p> <p>This indicator is not Applicable.</p>	Not Applicable

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	RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from 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>UAI 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. Certified FFB are sources from:</p> <ul style="list-style-type: none"> - Ulin Agro Estate - Kruing Agro Estate - Meranti Agro Estate - Koperasi Kebun Jambi Mekar Jaya Sempurna (scheme smallholders) - Koperasi Kebun Sempurna Mandiri Estate (scheme smallholders) <p>During audit ASA1.1 PT UAI is extend the scope of certification and include the Koperasi Perkebunan Sempurna Bersatu Estate (scheme smallholder) to be RSPO certified. Currently the estate has not yet certified.</p> <p>Whilst non-certified FFB are coming from:</p> <ul style="list-style-type: none"> - Koperasi Kebun Sempurna Bersatu (scheme smallholders) - Rudi (outsider FFB suppliers) - Ulin Agro Estate (new planting sanctions non-NPP) - Kruing Agro Estate (new planting sanctions non-NPP) - Meranti Agro Estate (new planting sanctions non-NPP) - PT Karya Prima Agro Mandiri (KPAM) <p>There is no change in the supply chain module since last assessment until audit ASA1.1.</p>	Complied

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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>UAI Palm Oil Mill is able to provide estimate volume of CPO and PK in a year period and it was recorded by the CB in Public Summary report and Certificate, consists estimate of FFB receiving from Ulin Agro Estate, Kruing Agro Estate, Meranti Agro Estate, Koperasi Kebun Jambi Mekar Jaya Sempurna Estate, Koperasi Kebun Sempurna Mandiri Estate and Non-certified FFB from third party supplier, Extraction rates, Processing capacity, CPO & PK production. The actual tonnage produced are recorded in each annual surveillance report.</p> <p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000001154. 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 (Jul 2023 – Jun 2024)</u></p> <p>FFB : 186,913 MT</p> <p>CPO : 45,793 MT (OER 24.50%)</p> <p>PK : 7,476 MT (KER 4.00%)</p> <p>Actual FFB receive and process and CPO and PK production since March 2023 – Feb 2024:</p> <ul style="list-style-type: none"> - FFB process: 145,297 MT (sustainable) & 29,509 MT (non sustainable) - CPO production: 34,851.29 MT (sustainable) & 7,079.20 MT (non sustainable) - PK production: 6,057.84 MT (sustainable) & 1,230.52 MT (non sustainable) 	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>UAI POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, therefore the site has been registered in RSPO IT Platform with ID number</p>	Complied

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		RSPO_PO1000006365 registered as PT Usaha Agro Indonesia Palm Oil Mill.	
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>The unit of certification has written procedure and work instruction to ensure the implementation of all elements specified in these requirements, e.g:</p> <ul style="list-style-type: none"> a) Procedure of Traceability and Mass Balance (P-SAG-PKS-PRS-14) dated 1 Jul 2020, Rev. 3 is covering the implementation of all the elements of the supply chain model requirements. Available as well, Standard Operational Procedure of Palm Oil Process which is included: Grading, Loading Ramp, Weighing Bridge, Sterilization Station, Threshing Station, Pressing Station, Clarification Station, Recycling CPO, Nut and Kernel, Engine Room, Boiler, Water Treatment, Final Effluent, and Laboratories. The procedure was available at the site office, complete and up to date covering the implementation of all the elements of the supply chain model requirements. b) The unit of certification is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain's general requirement and modular requirement, including training records. Sample seen: The latest training of RSPO Supply Chain Certification conducted on 13 September 2023. Attendance list, training material and photograph are available. c) Personal in charge for applying Supply Chain at UAI POM as refer to designation letter update 17 February 2024, as below: <ul style="list-style-type: none"> - Letter No: 003/PKS-KRY/SP/II/2024, dated 17 February 2024. Name: Desi Irrawati (WB operator). FFB weighing process and operating WB input system. - Letter No: 002/PKS-KRY/SP/II/2024, dated 17 February 2024. Name: Nispi (WB operator). FFB weighing process and operating WB input system. 	Complied

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		<ul style="list-style-type: none"> - Letter No: 006/PKS-KRY/SP/II/2024, dated 17 February 2024. Name: Tomi Lapisa (CPO/PK Delivery and Sounding Officer). Responsible for CPO/PK sounding and delivery. - Letter No: 004/PKS-KRY/SP/II/2024, dated 17 February 2024. Name: Yasinta Sarosa (Production Admin). Creating mass balance and traceability report. - Letter No: 005/PKS-KRY/SP/II/2024, dated 17 february 2024. Name: Asep Iman H (Laboratory Assistant and QC). Monitoring and controlling traceability mass balance report. - Letter No: 001/PKS-KRY/SP/II/2024, dated 17 February 2024. Name: M. Saujan (Security Head). Monitoring of FFB receiving at Mill. - Letter No: 007/PKS-KRY/SP/II/2024, dated 17 February 2024. Name: Ahmad Bustami (Administration Head). Monitoring of FFB receiving at Mill. <p>d) The procedure of Traceability and Mass Balance (P-SAG-PKS-PRS-14) dated 1 Jul 2020, Rev. 3 has included mechanism of receiving of certified and non-certified FFB. The mill uses supply chain Model Mass Balance, contamination is followed.</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 style="padding-left: 20px;">a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p style="padding-left: 20px;">b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management</p>	<p>PT UAI has a procedure to conduct internal audit as Procedure Audit Internal (P-SAG-HO-SUS-03), Revision 5, effective as of 1 August 2020. Internal audit conducted once a year. Latest internal audit RSPO including RSPO Supply chain requirement conducted on 16 – 22 February 2024. Internal audit report were evident, all issue raised during internal audit has been followed up by Corrective Action.</p> <p>The unit of certification conduct an annual management review of the audit results and the steps taken to rectify these discrepancies. Additionally, comprehensive records and reports of internal audits are maintained.</p>	Complied

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	review at least annually. The mill shall maintain the internal audit records and reports.		
3.8.7	<p>Purchasing and Goods In</p> <p>iv) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>v) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>vi) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The Palm Oil Mill (POM) maintains comprehensive records of all incoming certified and non-certified Fresh Fruit Bunches (FFBs). The exact quantities are documented in both the Mass Balance Table and Production Report. The POM distinguish between certified and uncertified FFBs by cross-referencing the incoming weighbridge tickets. The protocol for handling incoming FFBs is detailed in Section 7.1, titled "Identification of Sustainable FFB Inputs," within the RSPO Supply Chain System Traceability document (P-SAG-PKS-PRS-14).</p> <p>In the event of anticipated overproduction, the POM proactively initiates communication with the BVC, as outlined in Section 7.5.9 of the RSPO Supply Chain System & Traceability guidelines.</p> <p>The Certification Unit has introduced an updated procedure for Supply Chain System Traceability (P-SAG-PKS-PRS-14) on 4 July 2020. Section 7.6 of this procedure outlines the necessary steps to be taken by the Palm Oil Mill in the event of encountering non-conforming products.</p> <p>The Weighing Note for External Transactions includes details such as the truck number, driver's name, "<i>Surat Pengiriman Buah</i>" (SPB) number, and the weight of the received FFB (in tonnage).</p> <p>The Weighing Note for Internal Transactions comprises information like the truck number, driver's name, SPB number, estate name, division, block, sub-block, FFB received (in tonnage), and the weight of loose fruit (in kilograms). This note also includes information about the identification of sustainable and non-sustainable FFB, which can be determined from the block's identity.</p> <p>Sample seen for FFB receiving document:</p> <p>Certified FFB:</p>	Complied

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		<ul style="list-style-type: none"> - Surat Pengantar Buah Sawit No. UAE180324 dated 18/03/2024 from Ulin Agro Estate, vehicle number KH8196SE, Block PL043, PJ043, PH046, PJ047-052, PO049, PN048-049, estimate weight: 3,105 kg, driver Salmon. - Weighbridge Card No. TUI249337, dated 18/03/2024, SPB No. 180324/UAE, Product: FFB, vehicle number: KH8196SE, driver: Salmon, RSPO supply chain model: Mass Balance, RSPO certificate number: RSPO 790206, Unique number: 24031037; FFB nett weight Sustainable: 411 kg, Non sustainable: 2,354 kg. - Surat Pengantar Buah Sawit No. MAE180324 dated 18/03/2024 from Meranti Agro Estate, vehicle number B2602XAY, Block II0012-0015, IH0015, estimate weight: 3,850 kg, driver Ratman. - Weighbridge Card No. TUI249336, dated 18/03/2024, SPB No. 180324/MAE, Product: FFB, vehicle number: B2602XAY, driver: Ratman, RSPO supply chain model: Mass Balance, RSPO certificate number: RSPO 790206, Unique number: 24031036; FFB nett weight Sustainable: 4,210 kg, Non sustainable: 0 kg. <p>Non certified FFB: Weighbridge Card No. TUI244502, dated 29/01/2024, SPB No. 01/290124/RUDI, Product: FFB, vehicle number: KB9827GJ, driver: Ajan, RSPO supply chain model: N/A, FFB nett weight: 4,675 kg.</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <p>a) The name and address of the buyer;</p>	<p>UAI POM (Palm Oil Mill) has implemented a comprehensive system, including the "<i>Bukti Timbangan CPO/PK</i>" (FM-SAG-PKS-PRS-010202), also known as the Internal CPO/PK Weighing, which contains all the necessary information, comprises information like the vehicle number, driver's name, SPB number, transporter name, origin and destination, nett weight, product name, date of shipping.</p> <p>Furthermore, PT Usaha Agro Indonesia has provided evidence of sales contract, Shipping Instruction and delivery orders for certified Crude Palm Oil (CPO) and Palm Kernel (PK). Upon reviewing these documents,</p>	Complied

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	<p>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>	<p>it is clear that the certification unit has ensured the availability of the minimum information required for RSPO (Roundtable on Sustainable Palm Oil) certified products across a wide range of documents.</p> <p>Sample document verified:</p> <p><u>CPO Certified:</u></p> <ul style="list-style-type: none"> - Sales contract "Perjanjian Jual beli CPO RSPO Mass Balance antara PT Usaha Agro Indonesia dengan PT Cisadane Raya Chemical" Number: 003/CPO/SC/UI/0124 dated 22 January 2024. Seller name: PT Usaha Agro Indonesia, address: Kota ADM Jakarta Selatan, Gedung Sampoerna Strategis Square North Tower Lt. 39, Jl. Jend. Sudirman, Kav 45 – 46, Karet Semanggi, Setiabudi, Kota Adm. Jakarta Selatan, DKI Jakarta, 12930. Buyer name: PT Cisadane Raya Chemicals, address: Tangerang, Jl. Imam Bonjol No. 88 RT. 001/RW. 004 Karawaci. Product: CPO (RSPO MB), quantity: 1,850,000 Kg. Specification: FFA Max 5%. Shipping date 13 – 19 Feb 2024. Destination port: Tanjung Priok, Jakarta. - Instruksi Pemuatan (Shipping instruction) No. 003/CPO/IM/UI/0124, dated 30 January 2024. Delivery from PT Usaha Agro Indonesia, DO number 003/CPO/DI/UI/0124. Product: CPO RSPO Mass balance. Specification: FFA Max 5% at Destination port Tanjung Priok, Jakarta. Quantity: 1,850,000 kg. Transporter: Karya Mandiri Sejati. Shipping period 1 Feb 2024. Ship name: TK. AS STAR 2/TB.AS STAR 1. - Delivery Order number 003/CPO/DI/UI/0124 dated 30 Jan 2024, product: CPO RSPO MB. Quantity: 1,850 MT. Destination Port: Tanjung Priok. RSPO certificate number RSPO 790206, Supply chain model: Mass Balance. - Sample Weighbridge ticket #TUI247141 dated 28/02/2024, product: CPO, Nett weight 2,270 kg, vehicle number: B5024UV, driver: Deri, transporter: Rudi. 	
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		<p><u>PK Certified:</u></p> <ul style="list-style-type: none"> - Sales contract "Perjanjian Jual beli PK RSPO Mass Balance antara PT Usaha Agro Indonesia dengan PT Sumber Indah Perkasa" Number: 012/PK/SC/UI/0324 dated 5 March 2024. Seller name: PT Usaha Agro Indonesia, address: Kota ADM Jakarta Selatan, Gedung Sampoerna Strategis Square North Tower Lt. 39, Jl. Jend. Sudirman, Kav 45 – 46, Karet Semanggi, Setiabudi, Kota Adm. Jakarta Selatan, DKI Jakarta, 12930. Buyer name: PT Sumber Indah Perkasa, address: Jakarta Pusat, Sinar Mas Land Plaza Menara 2 Lt. 30, Jl. MH Thamrin No. 51, Gondangdia, Menteng, Jakarta Pusat, DKI Jakarta. Product: Palm Kernel (RSPO MB), quantity: 250,000 Kg. Specification: M+I Max 16% and FFA max 5%. Shipping date 8 – 17 March 2024. Destination port: Franco Gudang Ferrum Kumai. - Instruksi Pemuatan (Shipping instruction) No. 007//IM/UI/0124, dated 30 January 2024. Delivery from PT Usaha Agro Indonesia, DO number 003/CPO/DI/UI/0124. Product: CPO RSPO Mass balance. Specification: FFA Max 5% at Destination port Tanjung Priok, Jakarta. Quantity: 1,850,000 kg. Transporter: Karya Mandiri Sejati. Shipping period 1 Feb 2024. Ship name: TK. AS STAR 2/TB.AS STAR 1. - Delivery Order number 003/CPO/DI/UI/0124 dated 30 Jan 2024, product: CPO RSPO MB. Quantity: 1,850 MT. Destination Port: Tanjung Priok. RSPO certificate number RSPO 790206, Supply chain model: Mass Balance. <p>Sample Weighbridge ticket #TUI247141 dated 28/02/2024, product: CPO, Nett weight 2,270 kg, vehicle number: B5024UV, driver: Deri, transporter: Rudi.</p>	
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3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>PT UAI Palm Oil Mill (POM) not outsource its milling activities however operate subcontractor for CPO and PK transporter. The POM has established a documented control system with explicit procedures for outsourced processes, and these procedures have been effectively communicated to the contracted transportation service providers.</p> <p>The appointed transportation contractors have formal contract agreements in place:</p> <p>1. "Adendum Ketiga No. 0228/XII/COM/EX/2019 Atas Perjanjian Jasa Pengangkutan CPO Nomor: 051/X/COM/EX/2014" dated 31 December 2019. Contract between PT UAI and CV Karya Mandiri Sejati as CPO transporter; Address: Jl. Gajah Mada Komp. Palm Vista Residence D No. 20, RT/RW 030/005, Kali Nilam, Delta Pawan, Ketapang, Kalbar; The agreement specifies that its validity is automatically renewed for the following 12 months if there is no termination notice issued at least 30 days prior to the termination date.</p> <p>2. "Perjanjian Jasa Pengangkutan palm Kernel Nomor: 020/I/COM/EX/2019" dated 17 January 2019. Contract between PT UAI and PT Jangkar Prima Sejati as PK transporter; The agreement specifies that its validity is automatically renewed for the following 12 months if there is no termination notice issued at least 30 days prior to the termination date.</p> <p>The agreement include term and conditions that PT Usaha Agro Indonesia has the legal ownership of the CPO or PK during transport, and Contractors shall abide RSPO Supply Chain requirement including provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is deemed necessary and announced in advance.</p> <p>These formal agreements and their renewal clauses ensure that the transportation services for CPO and PK are well-documented and that</p>	Non-compliance
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		<p>the contractual relationships are maintained in accordance with the specified terms and conditions.</p> <p>Non conformity raised during audit:</p> <p>UAI Mill has outsourced the transportation activity for CPO and PK to contractor as below:</p> <ul style="list-style-type: none"> - CV Karya Mandiri Sejati, Agreement contract "Perjanjian Jasa Pengangkutan CPO Nomor: 051/X/COM/EX/2014" dated 13 Oct 2014 and "Adendum Ketiga No. 0228/XII/COM/EX/2019" dated 31 December 2019 – Contract for CPO transport - PT Jangkar Prima Sejati, Agreement contract "Perjanjian Jasa Pengangkutan Palm Kernel Nomor: 020/I/COM/EX/2019" dated 17 Jan 2019. <p>According to contract agreement it was noted that there is no information that UAI mill has ensure 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>No other evident of statement or information that UAI mill has ensure 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>	
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.	As of the audit date, UAI POM has outsourced the transportation of Crude Palm Oil (CPO) and Palm Kernel (PK) to third-party service providers. Detailed information about these contractors, including their names and contact details, is readily accessible and can be found in contract document.	Complied

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3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The unit of certification aware to inform the audit team in case there is changes in the list of CPO and PK transporter through the RSPO P&C Pre-Audit Information checklist.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>The UAI palm oil mill has maintained accurate, complete, up-to-date, and easily accessible records and reports, encompassing all facets of RSPO Supply Chain Certification Standard requirements. Some examples of the available records and reports include:</p> <ul style="list-style-type: none"> • Daily Mill Report • Closing Book Stock CPO RSPO Mass Balance • Weighbridge Ticket <p>In adherence to relevant legal and regulatory requirements, the mill has established a retention period of a minimum of two (2) years for all records and reports related to RSPO SCCS. This practice ensures the ability to verify the certified status of raw materials or products held in stock. The specific list of record and document retention periods can be found in the "<i>Daftar Catatan</i>" (FM-SAG-HO-SUS-020001).</p> <p>Usaha Agro Indonesia's palm oil mill operates under the Mass Balance Module, which entails the following practices:</p> <p>a. The mill keeps records and balances all receipts of RSPO certified Fresh Fruit Bunches (FFB) and deliveries of RSPO certified Crude Palm Oil (CPO) and Palm Kernel (PK) on a three-monthly basis, as exemplified in the Closing Book Stock CPO RSPO Mass Balance. A transaction verified during the audit period is as follows:</p> <ul style="list-style-type: none"> • Period: April 2023 to March 2024 • Incoming RSPO Certified FFB: 142,080.66 MT • Opening Stock RSPO/MB Certified CPO: 3,137.42 MT • RSPO/MB Certified CPO Produced: 34,215.06 MT 	Complied

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		<ul style="list-style-type: none"> • RSPO/MB Certified CPO Dispatched: 7,200 MT • Closing Stock RSPO/MB Certified CPO: 2,748.72 metric tons <p>b. The mill ensures that all volumes of certified CPO and PK delivered have been accurately deducted from the material accounting system in accordance with the conversion ratios specified by RSPO. Importantly, the mill exclusively delivers Mass Balance sales from a positive stock, adhering to RSPO standards and principles.</p>	
3.8.13	Extraction Rate 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.	The oil extraction rate (OER) and kernel extraction rate (KER) utilized by the Palm Oil Mill (POM) provide a dependable estimate of the quantity of certified Crude Palm Oil (CPO) and Palm Kernel (PK) derived from the processed Fresh Fruit Bunches (FFB). These extraction rates are determined using data from the Daily Mill Report and are considered reliable indicators of the mill's performance. The OER typically falls within the range of 23.21% to 25.15% (April 2023 – March 2024), while the KER ranges from 4.01% to 4.97%% (April 2023 – March 2024). These figures demonstrate the efficiency and effectiveness of the mill's extraction processes in converting FFB into CPO and PK while ensuring compliance with relevant standards and requirements.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Based on the Daily Mill Report, the actual OER and KER are updated on daily basis and summarized in the monthly report.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Not applicable. The POM is implementing Mass Balance module.	Not Applicable
3.8.16	Registration of Transactions	PT Usaha Agro Indonesia – UAI Palm Oil Mill is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable	Complied

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		<table><tr><td>TR-b47bb06d-364a</td><td>PT Smart Tbk</td><td>CSPK</td><td>MB</td><td>90.02</td><td>Confirmed</td></tr><tr><td>TR-78b7a3f8-d929</td><td>PT Smart Tbk</td><td>CSPK</td><td>MB</td><td>89.94</td><td>Confirmed</td></tr><tr><td>TR-37a31044-c9db</td><td>PT Smart Tbk</td><td>CSPK</td><td>MB</td><td>90.02</td><td>Confirmed</td></tr><tr><td>TR-d6a1d308-ae8a</td><td>PT Smart Tbk</td><td>CSPK</td><td>MB</td><td>90.06</td><td>Confirmed</td></tr><tr><td>TR-3053c9bd-5e0c</td><td>PT Smart Tbk</td><td>CSPK</td><td>MB</td><td>100.12</td><td>Confirmed</td></tr><tr><td>TR-2bb84c79-abc6</td><td>PT Smart Tbk</td><td>CSPK</td><td>MB</td><td>100.04</td><td>Confirmed</td></tr><tr><td>TR-750284cb-c05a</td><td>PT Andes Agro investama</td><td>CSPK</td><td>MB</td><td>35.58</td><td>Confirmed</td></tr></table> <p>Remove:</p> <p>Unit of certification has removed the CSPO with total volume 21,384 MT and CSPK 2,355 MT from their PalmTrace account for CPO sold as conventional. Below are remove transaction:</p> <ul style="list-style-type: none">- Transaction ID ST-TR-2fc4e4bc-391c; dated 20-03-2024, volume CSPO to remove: 21,384 MT; reason for removal: sold as conventional.- Transaction ID ST-TR-0e3ff880-7e12; dated 20-03-2024, volume CSPK to remove: 2,355 MT; reason for removal: sold as conventional.	TR-b47bb06d-364a	PT Smart Tbk	CSPK	MB	90.02	Confirmed	TR-78b7a3f8-d929	PT Smart Tbk	CSPK	MB	89.94	Confirmed	TR-37a31044-c9db	PT Smart Tbk	CSPK	MB	90.02	Confirmed	TR-d6a1d308-ae8a	PT Smart Tbk	CSPK	MB	90.06	Confirmed	TR-3053c9bd-5e0c	PT Smart Tbk	CSPK	MB	100.12	Confirmed	TR-2bb84c79-abc6	PT Smart Tbk	CSPK	MB	100.04	Confirmed	TR-750284cb-c05a	PT Andes Agro investama	CSPK	MB	35.58	Confirmed	
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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>The procedure for claims is stated in Procedure of Supply Chain System Traceability (P-SAG-PKS-PRS-14) dated 4 July 2020. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified Mass Balance is only stated in sales documents of RSPO certified product.</p>	Complied																																										

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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 Usaha Agro Indonesia Palm Oil Mill did not make corporate communication. Corporate communications are conducted by the parent company, PT. Sampoerna Agro Tbk as RSPO member with membership No. 1-0031-07-000-00, member since 9 January 2007 on website: https://sampoernaagro.com	Complied
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member’s history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership	In corporate communication, PT. Sampoerna Agro Tbk has display its RSPO membership status, display a link to the RSPO web address, stated that PT. Sampoerna Agro Tbk support the work of the RSPO and stated PT. Sampoerna Agro Tbk’s history with regard to the RSPO. PT. Sampoerna Agro Tbk did not uses RSPO trademark in the website.	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	On the website, PT. Sampoerna Agro Tbk does not uses the RSPO corporate logo.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	On the website, PT. Sampoerna Agro Tbk ensure that all communication is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Complied
4.5	Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include: • “We have been sourcing RSPO certified palm oil since (YEAR).” • “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.” • “We have been RSPO certified since (YEAR).” • “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.”	On the website, PT. Sampoerna Agro Tbk ensure that all communication is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products. According to website Sampoerna Agro, only stated: <i>“Including adhering to the highest criteria for sustainable palm oil development and other environmentally-friendly benchmarks. At the moment, Sampoerna Agro has obtained various certifications in palm oil</i>	Complied

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	<ul style="list-style-type: none"> • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "We are RSPO certified. Ask us for our RSPO certified products." 	<i>sector such as the Roundtable on Sustainable Palm Oil (RSPO) and International Sustainability & Carbon Certification (ISCC) certificates. We have also complied with the local best practices under the Indonesian Sustainable Palm Oil (ISPO) certification."</i>	
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p>	<p>PT UAI is certified member under Sampoerna Agro.</p> <p>On the website, PT. Sampoerna Agro Tbk ensure that all communication is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.</p> <p>According to website Sampoerna Agro, only stated:</p> <p><i>"Including adhering to the highest criteria for sustainable palm oil development and other environmentally-friendly benchmarks. At the moment, Sampoerna Agro has obtained various certifications in palm oil sector such as the Roundtable on Sustainable Palm Oil (RSPO) and International Sustainability & Carbon Certification (ISCC) certificates. We have also complied with the local best practices under the Indonesian Sustainable Palm Oil (ISPO) certification."</i></p>	Complied
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters,	PT UAI Product-specific communications made under sales contract, Delivery Order, Shipping Instruction and Weghbridge card. Stated in sales documents that the product they sold is RSPO Certified model MB.	Complied

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	displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.		
5.1.2	Product-specific communications are voluntary.	PT UAI stated the supply chain model and certificate number, e.g. in Sales contract, Delivery Order, Shipping Instruction and Weghbridge card.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	PT UAI did not display the RSPO label for product-specific communications.	Not Applicable
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 UAI did not use RSPO trademark or any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products.	Not Applicable
5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. <p>Auditor notes: This requirement is not applicable if it is RSPO P&C and SCC audits</p>	PT UAI did not use RSPO trademark or logo in the product specific communication.	Not Applicable
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or	PT UAI did not use RSPO trademark or logo in the product specific communication.	Not Applicable

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	<p>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</p> <p>Auditor notes:</p> <p>This requirement is not applicable if it is RSPO P&C and SCC audits</p>		
5.2 Off pack claims			
5.2.1	<p>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.</p>	<p>PT UAI did not use RSPO trademark or logo in the product specific communication.</p> <p>PT UAI Product-specific communications made under sales contract, Delivery Order, Shipping Instruction and Weghbridge card. Stated in sales documents that the product they sold is RSPO Certified model MB.</p>	Complied
5.2.2	<p>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.</p>	<p>It was verified that when selling certified oil palm product, PT UAI stated the supply chain model and certificate number, e.g. in sales contract, Delivery Order, Shipping Instruction and Weghbridge card.</p>	Complied
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of 	<p>PT UAI is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK.</p>	Not Applicable

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	<p>own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation.</p> <ul style="list-style-type: none"> • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
5.3 On pack claims			
5.3.1	<p>Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.</p>	PT UAI sold its oil palm product in bulk, there was no on-pack claim used.	Not Applicable
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 UAI sold its oil palm product in bulk, there was no on-pack claim used.	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 UAI sold its oil palm product in bulk, there was no on-pack claim used.	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 UAI sold its oil palm product in bulk, there was no on-pack claim used.	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 UAI sold its oil palm product in bulk, there was no on-pack claim used.	Not Applicable
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	PT UAI sold its oil palm product in bulk, there was no on-pack claim used.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	The communication of PT UAI has not mentioned to consumers information about their suppliers' RSPO membership status.	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	PT UAI sold its oil palm product in bulk, up to this moment, PT UAI has not use RSPO label or trademark.	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	PT UAI sold its oil palm product in bulk, up to this moment, PT UAI has not use RSPO label or trademark.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% or above of the oil palm content must be RSPO MB-certified.	The Mass Balance volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under Mass Balance model is considered 100% content.	Complied

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	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	The Mass Balance volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under Mass Balance model is considered 100% content.	Complied
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • 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. 	PT UAI was not using storytelling in product-related communications.	Not Applicable
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". 	PT UAI has not use RSPO label or trademark.	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.			

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4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>"Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk." Signed by CEO 1 April 2023. The policy No.4 stipulated commitment to respect human rights as per human rights declaration and human rights defender declaration by the United Nation, 4.a No discrimination based on race, tribe, nation origin, religion, physical disability, gender, sexual orientation, worker union affiliation, age;</p> <p>4.b Prohibit force labour, slavery and use human trafficking labour;</p> <p>4.c Not employ worker under 18 years old;</p> <p>4.d Protect the rights of all workers for collective bargaining;</p> <p>4.e Prevent sexual harassment and protect reproductive rights;</p> <p>4.f. Protect human rights defender;</p> <p>4.g Provide fair working opportunity and business opportunity for local communities.</p> <p>The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities on February and March 2024 (see document of <i>Laporan Sosialisasi Kebijakan Keberlanjutan dan Visi Misi Perusahaan</i> on 17 February 2024 and 16 March 2024, takes place in UAI POM, UAE & JMJS, KAE & SM, MAE & SB includes a list of attendees and photo documentation).</p> <p>Based on interviews with community representatives of Jambi Village, with sample workers in UAI POM, UAE & JMJS, KAE & SM, MAE & SB, confirmed all stakeholders were aware of the policy.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	<p>Based on interviews with community representatives of Jambi Village and previous land owner, company never use mercenaries and paramilitaries to instigate violence or harassment in their operation.</p>	Complied

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		<p>Based on review of complaint logbook, there is no evidence the company triggers violence, harasses and intimidation in plantation and mill operations.</p> <p>Based on interview with sample worker in UAI POM, UAE & JMJS, KAE & SM, MAE & SB, confirmed that company has no issue regarding human rights violation.</p>	
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>The company has prepared the "IMS Procedure Komunikasi, Partisipasi dan Konsultasi", document no. P-SAG-HO-CA&L-08, revision 4, date August 01, 2019. The complaint and grievance can come from internal and external. The system allows for the complainant to agree on the process of the grievance mechanism as stated point 7.4 "Resolution of Complaint/Grievance", such as:</p> <ul style="list-style-type: none"> For internal: Resolution refers to "Peraturan Perusahaan PT Usaha Agro Indonesia" - that was obtained from Manpower Agency as per document Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Nomor: P/6/DISNAKERTRANS-B.500.15.12.1/I/2023 tentang Pengesahan Peraturan Perusahaan PT Usaha Agro Indonesia Periode Januari 2023 – January 2025." : settlement with the direct supervisor no later than 3 (three) days; If it is not completed, it will be continued to a higher superior, for a maximum of 3 days. If it cannot be resolved, then it is forwarded to the head of the Human Resources department and the union management to be resolved by consensus (bipartite). For external Resolution by unit head: external parties submit verbal/written complaints to unit leaders; the unit leader resolves the complaint within an agreed period or within at least 14 days the company must provide an answer or response to the complaint. 	Complied

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		<ul style="list-style-type: none"> Resolution by mediation forum: if the problem cannot be resolved by unit leader, and both parties agree to create a mediation forum. A mediation forum is formed from the disputing parties and a neutral third party or does not side with one of the disputing parties. In the mediation forum the company is represented by the dept head/manager involved; Third parties as mediators can come from local government agencies, religious leaders. customary/traditional institutions, NGOs, or other people if it is accepted and agreed upon by both parties. <p>There is a system for protection of the anonymity of the complainant as sighted on document "Kebijakan Pelaporan Pelanggaran PT Sampoerna Agro Tbk." at point 5.1 and 5.2. There is no complaint or grievance as informed by management of UAI POM.</p> <p>There is a non-retaliation or non-reprisal policy to protect complainants or whistle-blowers as sighted on document "Kebijakan Pelaporan Pelanggaran PT Sampoerna Agro Tbk." at point 6.</p> <p>The complaint and grievance resolution mechanism has been communicated to surrounding communities, such as: dated 17 February 2024, location in Jambi Village.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The company has prepared the procedure to ensure that the system to deal with complaints and grievances is understood by affected parties, i.e.: document i.e.: "IMS Procedure Komunikasi, Partisipasi dan Konsultasi (document no. P-SAG-HO-CA&L-08, revision 4, date August 01, 2019) as stated at Point 7.1. (External communication) and 7.2 (internal communication).</p> <p>The procedure has communicated to surrounding communities, such as: dated 17 February 2024, location in Jambi Village.</p> <p>In Ulin Agro Estate and UAI POM, communication of "Kebijakan Berkelanjutan"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication,</p>	Complied

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		<p>participation and consultation process; carried out 17 February and 16 March 2024. The field assistant read out the policy and procedures to some worker who cannot read.</p> <p>Based on interview with sampled workers, labour union, communities from Jambi village; audit team has obtained information that the stakeholders have known the grievance procedure through regular dissemination.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia has demonstrated the record of complaints or grievance resolution as seen on documents "IMS Procedure Komunikasi, Partisipasi dan Konsultasi", document no. P-SAG-HO-CA&L-08, revision 4, date August 01, 2019. The procedure at point 7.4 said: "the management unit did recognize rights for the complainants to access independent legal and technical advice".</p> <p>The company has established a record book to compile all complaints received from the stakeholder i.e.: document of "Logbook Komunikasi Stakeholder". And on the other hand, a specific form has been established and used for handling complaints and grievances i.e.: Register of Information Request/Complaint Form (Form FM-SAG-RO-CA&L-080002). Since the last audit, there is no reported of any conflict been recorded or received by the unit of certification.</p> <p>Based on interview with Plantation Agency in Ketapang Regency during RAV-2023, there have been no significant conflicts between the company and the community or other parties and there have been no complaints Plantation Service in Ketapang Regency.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>As stated in the procedure of Handling of Complaints and Grievances of the Communication, Participation and Consultation Procedure (Ref. Doc.: P-SAG-HO-CA&L-08) – dated August 01, 2019; the management unit did recognize rights for the complainants to access independent legal and technical advice. Since the last audit, there is no report of any conflict been recorded or received by the unit of certification.</p>	Complied

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		Based on interview with Plantation Agency and Environment Agency of Ketapang Regency, there have been no significant conflicts between the company and the community or other parties and there have been no complaints.	
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated. - Minor compliance -	<p>Local development need has been identified by the unit of certification based on the SIA study and consultation with the local community (see indicator 3.4.1 for the SIA document). Based on the study and interview with the community surrounding the plantation, the company developed programs that contributed to the local community. The programs (planning and realization) were recorded in the several document i.e., <i>Program & Realisasi CSR PT Usaha Agro Indonesia Tahun 2023</i>, and <i>Program CSR PT Usaha Agro Indonesia Tahun 2024</i>.</p> <p>The programs consist of social support local education facilities, social support for local infrastructure such as local main road maintenance, and economic growth through local employment.</p> <p>The programs are based on the results of consultation with local community and local governance.</p> <p>PT Usaha Agro Indonesia has demonstrated the record of report of the contributions made to the local community development year 2023.</p> <p>Based on interview with local community (Secretary of Jambi Village) there was informed that the company has contributed such as on improvement of road infrastructure.</p>	Complied
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(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>Location permit 2007: Location permit issued in 2007 "Surat Bupati Ketapang No.403 tahun 2007 tentang Pemberian Izin Lokasi Pembangunan Perkebunan Kelapa Sawit atas nama PT. Usaha Agro Indonesia terletak di Kecamatan Manis</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>Mata dan Kendawangan, Kabupaten Ketapang seluas 11,300 Ha” dated 8 November 2007.</p> <p>Location permit 2008: Location permit issued in 2008 “Surat Bupati Ketapang No.250 tahun 2008 tentang Perubahan Keputusan Bupati Ketapang No.403 tahun 2007 tentang Izin Lokasi Pembangunan Perkebunan Kelapa Sawit dan Pabrik Pengolahan atas nama PT. Usaha Agro Indonesia di Kecamatan Manis Mata dan Kendawangan, Kabupaten Ketapang seluas 11,300 Ha” dated 11 July 2008.</p> <p>Location permit 2010: Location Permit issued in 2010: As per “Keputusan Bupati Ketapang No.414 Tahun 2010 tentang Revisi Perpanjangan Izin Lokasi Pembangunan Perkebunan Kelapa Sawit dan Pabrik Pengolahan Atas Nama PT. Usaha Agro Indonesia” dated 27 July 2010. Area allocated for PT. Usaha Agro Indonesia has been revised and extended for 11,300 Ha in Manis Mata and Kendawangan Regency.</p> <p>Land survey summary for gazette “Risalah Panitia B”: - “Risalah Panitia Pemeriksaan Tanah B No.21/HGU-HTPT/BPN/2014” dated 26 August 2014. The application for 8,781.42 Ha; for HGU; duration 35 years. Land survey map No.57-14.07-2014 dated 4 July 2014: - NIB.14.07.00.00.00065 of 2,465.74 Ha - NIB.14.07.00.00.00066 of 3,070.52 Ha - NIB.14.07.00.00.00067 of 858.30 Ha - NIB.14.07.00.00.00068 of 1,840.56 Ha</p>	
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		<ul style="list-style-type: none"> - NIB.14.07.00.00.00273 of 52.08 Ha - "Risalah Panitia Pemeriksaan Tanah B No.22/HGU-HTPT/BPN/2014" dated 27 August 2014. The application for 642.04 Ha; for HGU; duration 35 years. Land survey map No.57-14.07-2014 dated 4 July 2014: <ul style="list-style-type: none"> - NIB.14.07.00.00.00277 of 8.11 Ha - NIB.14.07.00.00.00278 of 633.93 Ha - "Risalah Panitia Pemeriksaan Tanah B No.23/HGU-HTPT/BPN/2014" dated 28 August 2014. The application for 765.55 Ha; for HGU; duration 35 years. Land survey map No.57-14.07-2014 dated 4 July 2014: <ul style="list-style-type: none"> - NIB.14.07.00.00.00274 of 474.96 Ha - NIB.14.07.00.00.00275 of 202.07 Ha - NIB.14.07.00.00.00276 of 88.52 Ha <p>Land title for Own Estate:</p> <ul style="list-style-type: none"> - Land title decree as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.6/HGU/KEM-ATR/BPN/2015 tentang Pemberian Hak Guna Usaha atas nama PT. Usaha Agro Indonesia atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 6 April 2015. With this decree, government granted the land title upon state land for 35 years (until 2050) of 8,287.20 Ha located in Jambi Village, Manis Mata District and Buntar Village, Kendawangan District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.80-14.07-2014" dated 15 September 2014: <ul style="list-style-type: none"> - NIB.14.07.00.00.00065 of 2,465.74 Ha - NIB.14.07.00.00.00066 of 3,070.52 Ha 	
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		<ul style="list-style-type: none"> - NIB.14.07.00.00.00067 of 858.30 Ha - NIB.14.07.00.00.00068 of 1,840.56 Ha - NIB.14.07.00.00.00273 of 52.08 Ha <p>Subsequently issued with certificates:</p> <ul style="list-style-type: none"> - Land title "Sertifikat HGU No.108 PT. Usaha Agro Indonesia" dated 24 June 2015 for 2,465.74 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00108. Completed with map scale 1:50000. - Land title "Sertifikat HGU No.109 PT. Usaha Agro Indonesia" dated 24 June 2015 for 3,070.52 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00109. Completed with map scale 1:60000. - Land title "Sertifikat HGU No.110 PT. Usaha Agro Indonesia" dated 24 June 2015 for 858.30 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00110. Completed with map scale 1:40000 - Land title "Sertifikat HGU No.111 PT. Usaha Agro Indonesia" dated 24 June 2015 for 1,840.56 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00111. Completed with map scale 1:50000 - Land title "Sertifikat HGU No.112 PT. Usaha Agro Indonesia" dated 24 June 2015 for 52.08 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00112. Completed with map scale 1:50000 - Land title decree as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.40/HGU/KEM-ATR/BPN/2018 tentang Pemberian Hak Guna Usaha atas nama PT. Usaha Agro Indonesia atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 30 May 2018. With this decree, government 	
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		<p>granted the land title upon state land for 35 years (until 2053) of 1,383.1225 Ha located in Jambi Village, Manis Mata District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.80-14.07-2014" dated 15 September 2014:</p> <ul style="list-style-type: none"> - NIB.10-14.07.00.00.00571 of 110.3902 Ha (issued 6 March 2017) - NIB.30-14.07-2017 of 1,272.7233 Ha (issued 31 March 2017) - NIB.14.07.00.00.00551 of 829.6624 Ha - NIB.14.07.00.00.00552 of 330.8042 Ha - NIB.14.07.00.00.00553 of 112.2657 Ha <p>Subsequently issued with certificates:</p> <ul style="list-style-type: none"> - Land title "Sertifikat HGU No.222 PT. Usaha Agro Indonesia" dated 5 July 2018 for 829.6624 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00222. Completed with map scale 1:50000. - Land title "Sertifikat HGU No.223 PT. Usaha Agro Indonesia" dated 5 July 2018 for 330.8042 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00223. Completed with map scale 1:50000. - Land title "Sertifikat HGU No.224 PT. Usaha Agro Indonesia" dated 5 July 2018 for 112.2657 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00224. Completed with map scale 1:25000. - Land title "Sertifikat HGU No.225 PT. Usaha Agro Indonesia" dated 5 July 2018 for 110.3902 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00225. Completed with map scale 1:50000. 	
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		<p>Land Title for Scheme Smallholders Koperasi Perkebunan Sempurna Mandiri:</p> <ul style="list-style-type: none"> - Land title decree for smallholder cooperative as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.7/HGU/KEM-ATR/BPN/2015 tentang Pemberian Hak Guna Usaha atas nama Koperasi Perkebunan "Sempurna Mandiri" atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 6 April 2015. With this decree, government granted the land title upon state land for 35 years (until 2050) of 642.04 Ha located in Danau Buntar Village, Kendawangan District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.53-14.07-2014" dated 4 July 2014: <ul style="list-style-type: none"> - NIB.14.07.00.00.00277 of 8.11 Ha - NIB.14.07.00.00.00278 of 633.93 Ha - Land title decree for smallholder cooperative as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.41/HGU/KEM-ATR/BPN/2018 tentang Pemberian Hak Guna Usaha atas nama Koperasi Perkebunan Sempurna Mandiri atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 30 May 2018. With this decree, government granted the land title upon state land for 35 years (until 2053) of 259.5522 Ha located in Danau Buntar Village, Kendawangan District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.030-14.07-2017" dated 31 March 2017: <ul style="list-style-type: none"> - NIB.14.07.00.00.00554 of 116.1114 Ha - NIB.14.07.00.00.00555 of 143.4408 Ha <p>Subsequently issued with certificates:</p>	
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		<ul style="list-style-type: none"> - Land title "Sertifikat HGU No.105 Koperasi Perkebunan Sempurna Mandiri" dated 24 June 2015 for 8.11 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00103. - Land title "Sertifikat HGU No.104 Koperasi Perkebunan Sempurna Mandiri" dated 24 June 2015 for 633.93 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00104. - Land title "Sertifikat HGU No.217 Koperasi Perkebunan Sempurna Mandiri" dated 5 July 2018 for 116.1114 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00217. - Land title "Sertifikat HGU No.218 Koperasi Perkebunan Sempurna Mandiri" dated 5 July 2018 for 143.4408 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00218. <p>Land Title for Scheme Smallholders Koperasi Perkebunan Jambi Mekar Jaya Sempurna:</p> <ul style="list-style-type: none"> - Land title decree for smallholder cooperative as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.5/HGU/KEM-ATR/BPN/2015 tentang Pemberian Hak Guna Usaha atas nama Koperasi Perkebunan "Jambi Mekar Jaya Sempurna" atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 6 April 2015. With this decree, government granted the land title upon state land for 35 years (until 2050) of 765.55 Ha located in Jambi Village, Manis Mata District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.54-14.07-2014" dated 4 July 2014: - NIB.14.07.00.00.00274 of 474.96 Ha - NIB.14.07.00.00.00275 of 202.07 Ha - NIB.14.07.00.00.00276 of 88.52 Ha 	
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		<ul style="list-style-type: none"> - Land title decree for smallholder cooperative as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.42/HGU/KEM-ATR/BPN/2018 tentang Pemberian Hak Guna Usaha atas nama Koperasi Perkebunan Jambi Mekar Jaya Sempurna atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 30 May 2018. With this decree, government granted the land title upon state land for 35 years (until 2053) of 554.4697 Ha located in Jambi Village, Manis Mata District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.030-14.07-2017" dated 31 March 2017: <ul style="list-style-type: none"> - NIB.14.07.00.00.00556 of 454.1873 Ha - NIB.14.07.00.00.00575 of 51.0485 Ha - NIB.14.07.00.00.00576 of 49.2339 Ha <p>Subsequently issued with certificates:</p> <ul style="list-style-type: none"> - Land title "Sertifikat HGU No.105 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 24 June 2015 for 474.96 Ha in Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00105. - Land title "Sertifikat HGU No.106 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 24 June 2015 for 202.07 Ha in Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00106. - Land title "Sertifikat HGU No.107 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 24 June 2015 for 88.52 Ha in Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00107. - Land title "Sertifikat HGU No.219 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 5 July 2018 for 454.1873 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00219. - Land title "Sertifikat HGU No.220 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 5 July 2018 for 51.0485 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00220. 	
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		<ul style="list-style-type: none"> - Land title "Sertifikat HGU No.221 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 5 July 2018 for 49.2339 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00221. <p>Land Title for Scheme Smallholders Koperasi Perkebunan Sempurna Bersatu:</p> <ul style="list-style-type: none"> - Certificate Number 14.07.00.00.2.00103 and NIB No. 14.07.00.00.00277 with area 8.11 Ha - Certificate Number 14.07.00.00.2.00104 and NIB No. 14.07.00.00.00278 with area 633.93 Ha - Certificate Number 14.07.00.00.2.00217 and NIB No. 14.07.00.00.00554 with area 116,11 Ha - Certificate Number 14.07.00.00.2.00218 and NIB No. 14.07.00.00.00555 with area 143.44 Ha <p>HGB Decree:</p> <p>Based on "Keputusan Kepala Kantor Wilayah Badan Pertanahan Nasional Provinsi Kalimantan Barat No.23/HGB/BPN.61/2014 tentang Pemberian Hak Guna Bangunan Atas Nama PT. Usaha Agro Indonesia seluas 149,200 m2 di Desa Jambi Kecamatan Manis Mata Kabupaten Ketapang Provinsi Kalimantan Barat" dated 3 December 2014.</p> <p>The land was originated from (sampled):</p> <ul style="list-style-type: none"> - State land under control Cawang of 1.61 Ha in Jambi village, Manis Mata District, Ketapang Regency – controlled since 1988 without administrative letter; equipped with village statement "Surat Pernyataan Penguasaan/Pemilikan Tanah" dated 12 March 2008. The said land compensated by PT. Usaha Agro Indonesia on 13 March 2008 as recorded under "Surat Perjanjian Kesepakatan Ganti Rugi 	
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		<p>Tanah dan Tanam Tumbuh No.013/SPK-GRTT/UAI/III/08. Out of 16,100 m2 applied for HGB of 2,900 m2.</p> <ul style="list-style-type: none"> - State land under control Tibin of 2.80 Ha in Jambi village, Manis Mata District, Ketapang Regency – controlled since 1985 without administrative letter; equipped with village statement "Surat Pernyataan Penguasaan/Pemilikan Tanah" dated 12 March 2008. The said land compensated by PT. Usaha Agro Indonesia on 13 March 2008 as recorded under "Surat Perjanjian Kesepakatan Ganti Rugi Tanah dan Tanam Tumbuh No.008/SPK-GRTT/UAI/III/08. Out of 28,000 m2 applied for HGB of 11,200 m2. - State land under control Cabe of 5.48 Ha in Jambi village, Manis Mata District, Ketapang Regency – controlled since 1986 without administrative letter; equipped with village statement "Surat Pernyataan Penguasaan/Pemilikan Tanah" dated 12 March 2008. The said land compensated by PT. Usaha Agro Indonesia on 13 March 2008 as recorded under "Surat Perjanjian Kesepakatan Ganti Rugi Tanah dan Tanam Tumbuh No.004/SPK-GRTT/UAI/III/08. Out of 54,800 m2 applied for HGB of 32,500 m2. <p><i>Izin Usaha Perkebunan/Plantation Permit 2016</i> Based on "Keputusan Bupati Ketapang No.913/Disbun-D/2016 tentang Perubahan Luas Lahan PT. Usaha Agro Indonesia" dated 30 December 2016. The permit stated the area changed from initially 9.728 Ha into 12,228 Ha with milling capacity 60 MT FFB/hour, located in Jambi village, Manis Mata District, Ketapang Regency.</p> <p><i>Izin Usaha Perkebunan/Plantation Permit 2020</i> Based on "Izin Usaha Perkebunan PT. Usaha Agro Indonesia No.8120106833913" dated 12 October 2018.</p>	
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		<p><i>Izin Lingkungan/Environmental Permit 2009</i> Environmental permit as per "Dokumen Analisis Dampak Lingkungan" approved as in "Keputusan Gubernur Kalimantan Barat No.29 Tahun 2009 tentang Kelayakan Lingkungan Kegiatan Perkebunan" dated 16 January 2009.</p> <p><i>Izin Lingkungan/Environmental Permit 2016</i> Environmental permit as per "Surat Kantor Lingkungan Hidup Kabupaten Ketapang No.710/KLH-B/2016 tentang Izin Lingkungan Kegiatan Pembangunan Perkebunan Kelapa Sawit beserta Fasilitas Pendukung oleh PT. Usaha Agro Indonesia di Kecamatan Manis Mata" dated 29 November 2016.</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> - Minor compliance - <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Based on interview with previous landowners:</p> <ul style="list-style-type: none"> - Company made initial socialization on plantation development plan to the surrounding communities. - The agreed rate for land compensation follows the Regency Regulation (Peraturan Daerah Kabupaten Ketapang No.6 Tahun 2006 mengenai Pengaturan Harga Dasar Ganti Rugi Tanam Tumbuh di Kabupaten Ketapang). The regulation reference is regulating the bottom price for land compensation, tree compensation, building compensation. - The community stated they provided with choice to get their land compensation and benefit of becoming scheme smallholder with cooperative. <p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin</p>	Complied

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		<p>Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each landowner negotiate individually but the "Satlak" team will be ready for consultation.</p> <p>Discussion: The benefit of plantation such as open road access, investment, scheme smallholder plantation, economic development explained. The government official covers area related to possible partnership and investment opportunity, but warning that government will monitor community development, environmental management. Community members respond that the land measurement process/inventory is accepted but company cannot forcefully make community surrender their land. Company stated the compensation and payment done once agreement based on negotiation for land parcel under PT. Usaha Agro Indonesia permit.</p> <p>Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.</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>Based on interview with previous landowner, company gives choices for the landowner to sell their land and get benefit of becoming scheme smallholder with cooperative.</p> <p>Some of the previous landowner does not sell their land until now and company respect the decision.</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>Based on interview with previous landowners, that company made initial socialization on plantation development plan to the surrounding communities. During the initial socialization phase, company explain the positive and negative aspect of plantation development. Positive aspect such as: improve economy condition, opportunity to work as company employee, opportunity for business partner (as vendor/contractor).</p>	

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		<p>Negative aspect: loss of natural biodiversity, increase in traffic load in the nearby village.</p> <p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each land owner negotiate individually but the "Satlak" team will be ready for consultation.</p> <p>Discussion: The benefit of plantation such as open road access, investment, scheme smallholder plantation, economic development explained. The government official covers area related to possible partnership and investment opportunity, but warning that government will monitor community development, environmental management. Community member respond that the land measurement process/inventory is accepted but company cannot forcefully make community surrender their land. Company stated the compensation and payment done once agreement based on negotiation for land parcel under PT. Usaha Agro Indonesia permit.</p> <p>Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.</p>	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping	PT. Usaha Agro Indonesia and community made participatory mapping and measurement before land compensation process. Based on	Non-compliance

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	<p>involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>interview with previous landowner sampled and cross check with map of land compensation:</p> <ul style="list-style-type: none"> - Giran stated mapping and measurement done before negotiation and land compensation; map of Giran's land can be identified. - Tata stated mapping and measurement done before negotiation and land compensation; sketch and location of Tata's land can be identified. - Madi stated mapping and measurement done before negotiation and land compensation; sketch and location of Madi's land can be identified. - Timpul stated mapping and measurement done before negotiation and land compensation; sketch and location of Timpul's land can be identified. <p>Non-conformity</p> <p>Based on the results of a field visit to HCV the Paya Tarum Riparian, Block D.033 MAE, an area was found that had been designated as an HCV, but was claimed by the local community.</p> <p>Interviews were conducted with representatives of Danau Buntar Village and Jambi Village, it was confirmed that there was community-owned land included in the PT UAI HGU (land title) area. The community claims that the community was not included/involved in mapping the HGU boundaries</p>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Based on interview with previous landowner, stated that fair information provided during initial socialization phase (positive and negative), land measurement and mapping process, negotiation, land compensation price determination, land compensation/payment and recording</p>	Complied

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		<p>process, scheme smallholder cooperative initiation, all in Bahasa Indonesia and they understand.</p> <p>Based on verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each landowner negotiates individually but the "Satlak" team will be ready for consultation.</p> <p>Discussion: The benefit of plantation such as open road access, investment, scheme smallholder plantation, economic development explained. The government official covers area related to possible partnership and investment opportunity, but warning that government will monitor community development, environmental management. Community members respond that the land measurement process/inventory is accepted but company cannot forcefully make community surrender their land. Company stated the compensation and payment done once agreement based on negotiation for land parcel under PT. Usaha Agro Indonesia permit.</p> <p>Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.</p>	
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Based on interview with previous landowners, audit team got information that they were free to choose their representative, however majority of previous landowners choose to negotiate the land	Complied

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	- Critical (Major) compliance -	compensation individually/directly with company. The previous landowners choose to appoint a representative, had chosen the village head and cultural leader (ketua adat) as their representation.	
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Since land compensation process started, company consulting/reporting to several government/organization annually such as to Plantation Agency of Ketapang Regency.	Complied
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	PT. Usaha Agro Indonesia can demonstrate documented identification of landowners in the concession area – Izin Usaha Perkebunan. This data then overlay on map "Peta Identifikasi Lahan PT. Usaha Agro Indonesia", scale 1:73,268.	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 a documented, long-term and two- way process of consultation and negotiation. - Critical (Major) compliance -	Based on interview with previous landowners, company has implemented principle of FPIC: <ul style="list-style-type: none"> - PT. Usaha Agro Indonesia has started with socialization of plantation development to Jambi village since 2008. - PT. Usaha Agro Indonesia has explained the positive and negative aspect of plantation development. - Landowners stated they were free to choose their representative, however majority of previous landowners choose to negotiate the land compensation individually/directly with company. - Landowners stated they have government officials from Ketapang Regency accompanying/consulting them during socialization process. - Landowners stated they can sell or keep their land. - Company offers option to build scheme smallholder plantation for community of Jambi village and Danau Rantau village. 	Complied

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		<p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each landowner negotiates individually but the "Satlak" team will be ready for consultation.</p> <p>Discussion: The benefit of plantation such as open road access, investment, scheme smallholder plantation, economic development explained. The government official covers area related to possible partnership and investment opportunity, but warning that government will monitor community development, environmental management. Community members respond that the land measurement process/inventory is accepted but company cannot forcefully make community surrender their land. Company stated the compensation and payment done once agreement based on negotiation for land parcel under PT. Usaha Agro Indonesia permit.</p> <p>Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.</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	Landowners stated they can sell or keep their land. PT. Usaha Agro Indonesia can demonstrate map of land whereby the owner does not want to sell their land and status is enclave.	Complied

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	<p>local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>		
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p>	<p>In commitment to ensuring local food and water security, the company actively engage FPIC process, promote SEIA participation, and facilitate participatory land-use planning with local communities. Throughout this collaborative effort, the company ensure and consider a wide range of options for food and water provisioning. Furthermore, dedication to transparency is reflected in the openness of land allocation processes, fostering trust and accountability within interactions with local stakeholders.</p> <p>Collective efforts have significantly contributed to local community development, including purchasing from the local community (as evidenced in the "Monitoring Pembelian Lokal" document for January to May 2023 and corporate social responsibility initiatives (as seen in the "Rekap Monitoring Realisasi CSR" documents for 2022 and 2023).</p> <p>Local community members have confirmed the positive impact of these contributions, which include funding for road maintenance, support for ritual activities, and more. These actions reflect ongoing commitment to the betterment of the communities surrounding the company.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each</p>	Complied

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		<p>landowner negotiates individually but the "Satlak" team will be ready for consultation.</p> <p>Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.</p>	
4.5.6	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each landowner negotiates individually but the "Satlak" team will be ready for consultation.</p> <p>Discussion: The benefit of plantation such as open road access, investment, scheme smallholder plantation, economic development explained. The government official covers area related to possible partnership and investment opportunity, but warning that government will monitor community development, environmental management.</p> <p>Community members respond that the land measurement process/inventory is accepted but company cannot forcefully make community surrender their land. Company stated the compensation and payment done once agreement based on negotiation for land parcel under PT. Usaha Agro Indonesia permit.</p> <p>Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan</p>	Complied

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		Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.	
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	There is no new lands acquired for plantations and mills after November 2018. Based on stakeholder consultation with village people and previous landowners, there was no national expropriation on national interest or agrarian reform in the area of their village. Company compensated land directly from village communities. Furthermore, upon review with location permit, Ketapang Regency stated in the permit that the concession of PT. Usaha Agro Indonesia was gazette as "Area Penggunaan Lain" – area for other use, as per "Rencana Tata Ruang Wilayah" – spatial planning Ketapang Regency.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Based on stakeholder consultation and interview with previous landowner, there was no community in Kendawangan, Ketapang Regency lives in voluntary isolation. The community was already open for incoming/migrating people from another region in Indonesia.	Not Applicable
Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	PT. Usaha Agro Indonesia referring to the corporate procedure for land and/or planting compensation "Sampoerna Agro Integrated Management System Procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh No.P-SAG-HO-CA&L-03 r4" dated 1 November 2019. The SOP on point 3.14 referencing FPIC approach in identifying legal/customary/use rights. Section 5.1 stating initial plotting or working area as per location permit "Izin Lokasi" and its map; socialization for plantation development to community, Muspida, district head, village head, hamlet leader, customary leader and other community member in the vicinity. Conduct general land survey continued with detailed land survey. Verification of	Complied

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		<p>land survey process. Identification and negotiation carried out directly with the landowner.</p> <p>The area for land compensation shall not overlapping with other purpose/permit, within company concession/plantation permit, area condition is complying with field condition, compensation price agreed by all parties.</p> <p>Section 7 stating database checking, document showing legal ownership of the land legality and validity, land hectarage, vegetation condition, legal boundary of the land. 7.2.4 stated company ensure provide equal opportunity in land selection taking into consideration gender, migrant vs local community, legal ownership and communal ownership from customary people.</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia referring to the corporate procedure for land and/or planting compensation "Sampoerna Agro Integrated Management System Procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh No.P-SAG-HO-CA&L-03 r4" dated 1 November 2019. The SOP on point 3.14 referencing FPIC approach in identifying legal/customary/use rights.</p> <p>Section 5.1 stating initial plotting or working area as per location permit "Izin Lokasi" and its map; socialization for plantation development to community, Muspida, district head, village head, hamlet leader, customary leader and other community member in the vicinity. Conduct general land survey continued with detailed land survey. Verification of land survey process. Identification and negotiation carried out directly with the landowner.</p> <p>The area for land compensation shall not overlapping with other purpose/permit, within company concession/plantation permit, area condition is complying with field condition, compensation price agreed by all parties.</p>	Complied

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		Section 7 stating database checking, document showing legal ownership of the land legality and validity, land hectarage, vegetation condition, legal boundary of the land. 7.2.4 stated company ensure provide equal opportunity in land selection taking into consideration gender, migrant vs local community, legal ownership and communal ownership from customary people.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement). - Minor compliance -	The evidence that men and women have equal opportunities as observed during interview with stakeholders. There are no gender discrimination issues indication found on the documents, records, and interview result.	Complied
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. - Minor compliance -	<p>PT Usaha Agro Indonesia showed evidence demonstrating FPIC process during land acquisition as below:</p> <ul style="list-style-type: none"> - Document of "Surat Pernyataan Pelepasan Hak Atas Tanah" - Document of "Surat Pernyataan dan Persetujuan Suami/Istri" - Document of "Daftar rekapitulasi ganti rugi lahan" (list of land compensation summary), updated in June 2023. <p>Based on interview with sample previous landowner has confirmed the above process and that they have been consulted, negotiated, and compensated fairly and agreed upon for every land area that has been acquired by the company. Sample seen: Berita Acara Pembayaran GRTT No: 2/BAP-GRTT/UAI/IV/2017, Berita Acara Pembayaran GRTT No: 32/BAP-GRTT/UAI/III/2014 and Berita Acara Pembayaran GRTT No: 17/BAP-GRTT/UAI/II/2014, Berita Acara Serah Terima GRTT No: 043/BAST-GRTT/UAI.VII/2012.</p> <p>PT Usaha Agro Indonesia currently owns a total of 11,953.3225Ha land banks, which have been divided into 3 phase of development. The area covered in this certification is Phase 1 is under Hak Guna Usaha (HGU) Nomor: 6/HGU/KEM-ATR/BPN/2015 covering total land title of 8,287.20Ha. Phase 2 and Phase 3 is covered under HGU Nomor:</p>	Complied

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		40/HGU/KEM-ATR/BPN/2018 (covering 1,383.1225Ha) and Izin Lokasi 915/UAI/XI/16/HQ/GC (covering 2,283Ha).	
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia referring to the corporate procedure for land and/or planting compensation "Sampoerna Agro Integrated Management System Procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh No.P-SAG-HO-CA&L-03 r4" dated 1 November 2019. The SOP on point 3.14 referencing FPIC approach in identifying legal/customary/use rights.</p> <p>Section 5.1 stating initial plotting or working area as per location permit "Izin Lokasi" and its map; socialization for plantation development to community, Muspida, district head, village head, hamlet leader, customary leader and other community member in the vicinity. Conduct general land survey continued with detailed land survey. Verification of land survey process. Identification and negotiation carried out directly with the landowner.</p> <p>The area for land compensation shall not overlapping with other purpose/permit, within company concession/plantation permit, area condition is complying with field condition, compensation price agreed by all parties.</p> <p>Section 7 stating database checking, document showing legal ownership of the land legality and validity, land hectareage, vegetation condition, legal boundary of the land. 7.2.4 stated company ensure provide equal opportunity in land selection taking into consideration gender, migrant vs local community, legal ownership and communal ownership from customary people.</p>	Complied

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4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia referring to the corporate procedure for land and/or planting compensation "Sampoerna Agro Integrated Management System Procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh No.P-SAG-HO-CA&L-03 r4" dated 1 November 2019. The SOP on point 3.14 referencing FPIC approach in identifying legal/customary/use rights.</p> <p>Section 5.1 stating initial plotting or working area as per location permit "Izin Lokasi" and its map; socialization for plantation development to community, Muspida, district head, village head, hamlet leader, customary leader and other community member in the vicinity. Conduct general land survey continued with detailed land survey. Verification of land survey process. Identification and negotiation carried out directly with the landowner.</p> <p>The area for land compensation shall not overlapping with other purpose/permit, within company concession/plantation permit, area condition is complying with field condition, compensation price agreed by all parties.</p> <p>Section 7 stating database checking, document showing legal ownership of the land legality and validity, land hectarage, vegetation condition, legal boundary of the land. 7.2.4 stated company ensure provide equal opportunity in land selection taking into consideration gender, migrant vs local community, legal ownership and communal ownership from customary people.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Based on interview with government officials in Ketapang Regency, village communities and previous landowner, company open for new business opportunity.</p> <p>The company demonstrating commitment in nurture the scheme smallholder for Jambi village and Danau Buntar village. The income from scheme smallholder plantation production can help people's economy.</p>	Complied

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Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Based on interview with government officials in Ketapang Regency, village communities and previous landowner there was no report of land conflict in PT. Usaha Agro Indonesia area including Extension of Scope (Koperasi Perkebunan Sempurna Bersatu) PT. Usaha Agro Indonesia referring to the corporate procedure for claim and land conflict handling "Sampoerna Agro Integrated Management System Procedure Penanganan Klaim dan Sengketa Lahan No.P-SAG-HO-CA&L-09 r1" dated 1 September 2017. The SOP on point 3.14 referencing FPIC approach in identifying legal/customary/use rights. Section 7.1 explaining land claim and land dispute handling process through persuasive method -> mediation -> litigation.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Based on interview with government officials in Ketapang Regency, village communities and previous landowner there was no report of land conflict in PT. Usaha Agro Indonesia area including Extension of Scope (Koperasi Perkebunan Sempurna Bersatu)	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	Based on interview with government officials in Ketapang Regency, village communities and previous landowner there was no report of land conflict in PT. Usaha Agro Indonesia area including Extension of Scope (Koperasi Perkebunan Sempurna Bersatu)	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	Based on interview with government officials in Ketapang Regency, village communities and previous landowner there was no report of land	Complied

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	- Minor compliance -	<p>conflict in PT. Usaha Agro Indonesia area including Extension of Scope (Koperasi Perkebunan Sempurna Bersatu)</p> <p>PT. Usaha Agro Indonesia including Extension of Scope (Koperasi Perkebunan Sempurna Bersatu) has mapping the enclave area, for landowner that does not want to sell their land.</p>	
Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance -	<p>UAI POM receives FFB from own estate, sisters company estates, smallholders from other estate and out grower/independent smallholder. Available Minutes of Meeting on Determination of K Index and FFB Prices for Palm Oil Production by West Kalimantan Smallholders for the second period of February 2024. FFB price are determined by Dinas Perkebunan Provinsi Kalimantan Barat.</p> <p>The unit of certification has taken proactive steps to disseminate information of FFB price to smallholders. The procedures governing the dissemination of this information have been defined and regulated within the Communication, Participation, and Consultation Procedure (No. P-SAG-HO-A & L-08). This procedure outlines the approach to communication, involving smallholders and stakeholders in the decision-making process, thereby promoting transparency and collaboration within the palm oil production ecosystem.</p>	Complied
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -	<p>UAI POM ensures that the prices for Fresh Fruit Bunches (FFB) determined are communicated to outgrowers and smallholders, in accordance with the terms stipulated in the contracts. To facilitate this communication, FFB prices are conveyed to the related parties on a daily basis through phone calls and text messages. This frequent and direct communication ensures that all stakeholders are well-informed about the pricing agreements and helps maintain transparency and trust in the</p>	Complied

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		relationship between the mill and the smallholders. During this audit ASA1.1 it was confirmed through interview with smallholder that FFB price update has explained and informs to smallholder	
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>The determination of FFB prices is aligned with the pricing mechanism established by the plantation agency “Dinas Perkebunan Provinsi Kalimantan Barat”, which updates prices every two weeks. The updates in FFB pricing have been thoroughly discussed and mutually agreed during special meetings held between the Palm Oil Mill (POM) and its external suppliers. This collaborative approach ensures that both parties are informed and in agreement with any changes in pricing, promoting transparency and fairness in the pricing structure for FFB. Available Minutes of Meeting on Determination of K Index and FFB Prices for Palm Oil Production by West Kalimantan Smallholders for the second period of February 2024.</p>	Complied
5.1.4	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>During the audit, it was verified that contracts for the supply of Fresh Fruit Bunches (FFB) between the company and FFB suppliers have been duly signed by both parties. There was no involvement of any other entity in the decision-making process or providing input on the terms and provisions of these agreements.</p> <p>Additionally, the audit team observed that the company has entered into long-term collaboration agreements with local Independent Smallholders for the management of their smallholder estates and the supply of FFB. Evidence of these agreements was verified during the audit ASA 1.1 and includes:</p> <ol style="list-style-type: none"> 1. “Perjanjian Kerjasama Pengembangan/Pembangunan Perkebunan Kelapa Sawit Pola Kemitraan Antara PT Usaha Agro Indonesia Dengan Koperasi Perkebunan Jambi Mekar Jaya Sempurna” – agreement dated 25 August 2010. 2. “Perjanjian Kerjasama Pengembangan/Pembangunan Perkebunan Kelapa Sawit Pola Kemitraan Antara PT Usaha Agro Indonesia 	Complied

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		<p>Dengan Koperasi Perkebunan Sempurna Mandiri” – agreement dated 20 December 2011.</p> <p>3. “Perjanjian Kerjasama Pengembangan Perkebunan Kelapa Sawit Pola Kemitraan antara PT. UAI dengan Koperasi Perkebunan Sempurna Bersatu”, based on “Keputusan bersama Nomor: 001/Kemitraan/Usaha Agro Indonesia/I/2012, Nomor: 001/Kopbun-Sempurna Bersatu/I/2012”. Agreement dated 17 January 2012.</p> <p>It was observed that these agreements have been signed by both parties and have been witnessed by the respective local authorities, adding an additional layer of legitimacy and accountability to the collaborations. During this audit ASA1.1 no change in term of agreement contract. During interview with scheme smallholder confirmed that company has implement the agreement contract accordingly.</p>	
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Based on review to the contract, it was noted that Contracts are fair, legal and transparent and have an agreed timeframe.</p> <ol style="list-style-type: none"> 1. FFB Supply Agreement between PT. UAI with PT. Kalimantan Prima Agro Mandiri No: 212/XII/COM/EX/2021 dated 29 October 2021 2. Cooperation Agreement for the Development/Construction of Palm Oil Plantation Partnership Pattern between PT. UAI and Koperasi Jambi Mekar Jaya Sempurna, dated 25 August 2010. 3. Partnership Agreement for the Development/Construction of an Oil Palm Plantation between PT. UAI and Koperasi Perkebunan Sempurna Mandiri, dated 20 December 2011. 4. Partnership Agreement for the Development of Oil Palm Plantation between PT. UAI and Koperasi Perkebunan Sempurna Bersatu, based on joint Decree Number: 001/Kemitraan/Usaha Agro Indonesia/I/2012, Number: 001/Kopbun-Sempurna Bersatu/I/2012, dated 17 January 2012. 	Complied

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		<p>5. FFB Supplier Agreement between PT UAI and Rudi, No.001/UAI/TBS/IV/2023, dated 1 April 2023.</p> <p>6. During this audit ASA1.1 no change in term of agreement contract. During interview with scheme smallholder and FFB supplier confirmed that company has implement the agreement contract accordingly.</p>	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given to the suppliers (scheme smallholders and independent smallholders).</p> <p>Available evidence of FFB payment, sample seen:</p> <ul style="list-style-type: none"> • Paid to Koperasi Perkebunan Sempurna Mandiri • Address: Danau Buntar Village, Kendawangan District, Ketapang Regency • Total: Rp. 1,073,577,383 • No. Current Account/Cheque: UAIMDR3 260224 • Open date: 26/02/2024 • Liquidated date: 26/02/2024 • Description: FFB Purchase. • FFB payment are in accordance with FFB price determination by Dinas Perkebunan Kalimantan Barat and the payment time are in accordance with agreement. 	Complied
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	<p>Weighbridge at UAI POM is annually calibrated by an independent third party.</p> <p>Latest calibration is on 8 June 2023; Weighing Type ZM510 and E1205; Serial Number 182950645 and 141050362; Capacity 40.000 Kg. Calibrated by PT MUGI. Next calibration will be conducted on June 2024.</p>	Complied

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5.1.8	<p>The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p> <p>- Minor compliance -</p>	<p>The units of certification are actively supporting Independent Smallholders (ISH) with their certification efforts. There are three smallholder schemes listed under the company's management that supply Fresh Fruit Bunches (FFB) to the company. During this audit ASA1.1 there is no changing in scheme smallholder partner. Based on the verification during the audit, it was observed that the company has entered into long-term agreements with these smallholders, with agreements spanning a 30-year validity. The agreements are as follows:</p> <ol style="list-style-type: none"> 1. "Perjanjian Kerjasama Pengembangan/Pembangunan Perkebunan Kelapa Sawit Pola Kemitraan Antara PT Usaha Agro Indonesia Dengan Koperasi Perkebunan Jambi Mekar Jaya Sempurna" – agreement dated 25 August 2010. 2. "Perjanjian Kerjasama Pengembangan/Pembangunan Perkebunan Kelapa Sawit Pola Kemitraan Antara PT Usaha Agro Indonesia Dengan Koperasi Perkebunan Sempurna Mandiri" – agreement dated 20 December 2011. 3. "Perjanjian Kerjasama Pengembangan Perkebunan Kelapa Sawit Pola Kemitraan antara PT. UAI dengan Koperasi Perkebunan Sempurna Bersatu", based on "Keputusan bersama Nomor: 001/Kemitraan/Usaha Agro Indonesia/I/2012, Nomor: 001/Kopbun-Sempurna Bersatu/I/2012". Agreement dated 17 January 2012. <p>According to these agreements, the management of the smallholders' land is carried out by the company, covering upkeep work such as spraying, slashing, and manuring, all the way through to harvesting. In return, the FFB is supplied directly to the UAI Palm Oil Mill (POM). The revenue generated from the sale of FFB to the POM is shared with a specified ratio, typically 80:20 (with 20% going to the smallholders), contingent on the periodic FFB prices. Furthermore, the land automatically becomes part of the certification scope and is subject to</p>	Complied
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		<p>compliance with RSPO requirements, as agreed upon in these agreements. Koperasi Perkebunan Jambi Mekar Jaya Sempurna and Koperasi Perkebunan Sempurna Mandiri have been RSPO certified since 2021, whilst Koperasi Perkebunan Sempurna Bersatu is still in progress. Interviews with the smallholders during audit ASA1.1 have confirmed that they are fully aware of the provisions of these agreements and have expressed their satisfaction with this arrangement.</p>	
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has established a grievance mechanism as outlined in Section 7 of the Handling of Complaints and Grievances in the Communication, Participation, and Consultation Procedure (P-SAG-HO-CA&L-08), dated 1 August 2019. Additionally, the procedure for handling complaints and grievance mechanism is detailed in Chapter 12 of the agreement: Legal Options and Dispute Resolution.</p> <p>The company has taken proactive steps to brief all relevant stakeholders on the complaint and grievance mechanism. Various consultation activities have been conducted with stakeholders, including socialization sessions held for FFB supplying farmers and FFB transporting contractors, latest on February 2024. During this event, independent smallholders also attended, ensuring that they were informed about the grievance mechanisms in place.</p> <p>Moreover, the company maintains a stakeholder communication logbook, which helps keep a record of interactions and communications with stakeholders. This logbook is a valuable for tracking and managing stakeholder engagement, ensuring transparency and accountability in addressing concerns and grievances. During audit ASA1.1 there is no grievance from scheme smallholder, it was also confirmed during interview with scheme smallholder during audit. Any issue and grievance will be follow up according to Communication, Participation, and Consultation Procedure (P-SAG-HO-CA&L-08), dated 1 August 2019.</p>	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			

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5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>The unit of certification manages three scheme smallholders that supply Fresh Fruit Bunches (FFB) to the company. During this audit ASA1.1 there is no change in term of scheme smallholder partnership. These scheme smallholders are as follows:</p> <ol style="list-style-type: none"> 1. Koperasi Perkebunan Jambi Mekar Jaya Sempurna (KPJMJS), certified in 2021. 2. Koperasi Perkebunan Sempurna Mandiri (KPSM), certified in 2021. 3. Koperasi Perkebunan Sempurna Bersatu (KPSB), in progress for certification. <p>The management of the smallholders' land is carried out by the company, covering upkeep work such as spraying, slashing, manuring, and even harvesting. In return, the smallholders receive revenue from the sale of FFB to the Palm Oil Mill (POM) following an 80:20 ratio, with 20% of the proceeds going to the smallholders. The exact distribution depends on the periodic FFB prices. Importantly, the land managed by smallholders is automatically included in the certification scope and is subject to compliance with RSPO requirements.</p> <p>In addition to these practices, the company has implemented Corporate Social Responsibility (CSR) programs, with annual budget allocations. Details of the CSR programs, including those completed in 2023, were made available to the audit team during the audit. These CSR initiatives reflect the company's commitment to social and community development, further demonstrating its dedication to sustainability and responsible business practices.</p>	Complied
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p>	<p>The unit of certification manages three scheme smallholders that supply Fresh Fruit Bunches (FFB) to the company. These scheme smallholders are as follows:</p> <ol style="list-style-type: none"> 1. Koperasi Perkebunan Jambi Mekar Jaya Sempurna (KPJMJS), certified in 2021. 	Non-compliance

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	- Minor compliance -	<p>2. Koperasi Perkebunan Sempurna Mandiri (KPSM), certified in 2021.</p> <p>3. Koperasi Perkebunan Sempurna Bersatu (KPSB), in progress for certification.</p> <p>The management of the smallholders' land is carried out by the company, covering upkeep work such as spraying, slashing, manuring, and even harvesting. In return, the smallholders receive revenue from the sale of FFB to the Palm Oil Mill (POM) following an 80:20 ratio, with 20% of the proceeds going to the smallholders. The exact distribution depends on the periodic FFB prices. Importantly, the land managed by smallholders is automatically included in the certification scope and is subject to compliance with RSPO requirements.</p> <p>Non-conformity</p> <p>It was confirmed during interview with the management of the Koperasi Jambi Mekar Jaya Sempurna and Koperasi Perkebunan Sempuran Bersatu and Koperasi Perkebunan Sempurna Mandiri, stated that there were no programs and training provided to Plasma for institutional improvement, Agronomy, K3, FPIC, RSPO and other aspects.</p> <p>Based on a review of documents, the company was also unable to demonstrate a training program for Scheme Smallholder.</p> <p>PT Usaha Agro Indonesia has not demonstrated a capacity building program for plasma/smallholders.</p>	
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>Support to the smallholder is shown by the development of Scheme Smallholder. During this audit ASA1.1 there is no change in term of scheme smallholder partnership. There are 3 Scheme Smallholder existed around the plantation area of PT UAI, which is:</p> <p>1. Koperasi Perkebunan Jambi Mekar Jaya Sempurna (KPJMJS),</p>	Complied

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		<p>2. Koperasi Perkebunan Sempurna Mandiri (KPSM), 3. Koperasi Perkebunan Sempurna Bersatu (KPSB),</p> <p>The operations in scheme smallholders such as upkeep, weeding, pesticide spraying harvesting and FFB transport are fully managed by PT UAI. KPJMJS and KPSM have been certified in 2021, whilst KPSB is in progress for certification.</p>	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -</p>	<p>The operations in scheme smallholders are fully managed by PT UAI including work with pesticide. All pesticide applicators which is worker of the company are already trained by the unit of certification.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -</p>	<p>The scheme smallholders under the company's management have a 30-year binding agreement. This agreement outlines the company's responsibilities, including land management encompassing maintenance, weeding, pesticide spraying, harvesting, and FFB transportation.</p> <p>In return, smallholders receive revenue from the sale of their Fresh Fruit Bunches (FFB) to the Palm Oil Mill (POM), with their income dependent on periodic FFB prices. Additionally, their land automatically falls within the certification scope and is subject to compliance with the RSPO Principles and Criteria (P&C) requirements, as stipulated in the aforementioned agreement.</p> <p>Interviews with the scheme smallholders during audit ASA1.1 confirmed their awareness of the agreement's provisions, and they express satisfaction with this arrangement.</p> <p>The company dutifully reports on the progress of its smallholder support program in the Annual Communication on Progress (ACOP), demonstrating commitment to transparency and responsible management practices.</p>	Complied

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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	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia as subsidiary of PT Sampoerna Agro Tbk has shown the commitment of non-discrimination and equal opportunity policy as explained at Kebijakan Keberlanjutan PT Sampoerna Tbk that was signed by Chief Executive Officer dated 1 April 2023.</p> <p>In point 4.a was mentioned that commitment to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age.</p> <p>PT Usaha Agro Indonesia has defined the HR procedure to implement the equal opportunity, example:</p> <ul style="list-style-type: none"> • Procedure Recruitment of Daily Worker (P-SAG-ADM-KTU-04, dated 1 March 2018), Penilaian Prestasi Kerja (P-SAG-HO-HR-03, dated 1 Aug 2019) and Penyediaan Staff (P-SAG-HO-HR-01, dated 1 Sep 2017) • Procedure for retirement and termination and other matters related to employment, 'Peraturan Perusahaan PT Usaha Agro Indonesia' - that was approved by Manpower Agency as per document "Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Nomor: P/6/DISNAKERTRANS-B.500.15.12.1/I/2023" regarding Ratification of PT Usaha Agro Indonesia Company Regulations for the Period January 2023 – January 2025. • Record of the employee recruitment process as follows: <ul style="list-style-type: none"> - Employee request form (FM-SR-HO-HRS-010001) - Evidence of follow-up from employee recruitment activities in the form of recorded communication via email 	Complied

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		<ul style="list-style-type: none"> - Evidence of the next follow-up from the employee recruitment process, namely a Work Call Letter. <p>The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities in February and March 2024 see document of <i>Laporan Sosialisasi Kebijakan Keberlanjutan dan Visi Misi Perusahaan</i> on 17 February 2024 and 16 March 2024, takes place in UAI POM, UAE & JMJS, KAE & SM, MAE & SB, includes a list of attendees and photo documentation).</p> <p>Based on interviews with community representatives of Jambi Village, with workers' representative in UAI POM, UAE & JMJS, KAE & SM, MAE & SB, confirmed all stakeholders were aware of the policy.</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>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia has shown evidence that non-discrimination and equal opportunity policy is implemented.</p> <p>Based on employee list updated in February 2024, there was cloud concluded that the unit of certification does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender. The workers came from various religion, ethnic, and area.</p> <p>Based on interview with LKS Bipartit, Gender Committee, Village Heads, Plantation Agency, and Manpower Agency, they mentioned that there is no indication of discrimination conducted by Unit of certification. The job vacancies were published, the recruitments were based on competencies and suitability with the role needed. Local communities and women are not discriminated (there is no migrant worker).</p>	Complied
6.1.3	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.	PT Usaha Agro Indonesia has demonstrate the document Company Regulation – Peraturan Perusahaan (PP) that was approved by Manpower Agency as per document " <i>Keputusan Kepala Dinas Tenaga</i>	Complied

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	<p>- Minor compliance -</p>	<p><i>Kerja dan Transmigrasi Nomor: P/6/DISNAKERTRANS-B.500.15.12.1/I/2023</i>" regarding Ratification of PT Usaha Agro Indonesia Company Regulations for the Period January 2023 – January 2025.</p> <p>PT Usaha Agro Indonesia has defined the HR procedure to implementation the equal opportunity, example:</p> <ul style="list-style-type: none"> • Procedure Recruitment of Daily Worker (P-SAG-ADM-KTU-04, dated 1 March 2018, Job Performance Assessment (P-SAG-HO-HR-03, dated 1 Aug 2019) and Staff Provision (P-SAG-HO-HR-01, dated 1 Sep 2017) • Procedure for retirement and termination and other matters related to employment stated on Company Regulation of PT Usaha Agro Indonesia' - that was approved by Manpower Agency as per document "<i>Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Nomor: P/6/DISNAKERTRANS-B.500.15.12.1/I/2023</i>" regarding Ratification of PT Usaha Agro Indonesia Company Regulations for the Period January 2023 – January 2025. • Record of the employee recruitment process as follows: <ul style="list-style-type: none"> - Employee request form (FM-SR-HO-HRS-010001) - Evidence of follow-up from employee recruitment activities in the form of recorded communication via email - Evidence of the next follow-up from the employee recruitment process, namely a Work Call Letter. <p>The company has implemented employment procedures and recorded on several documents below:</p> <ul style="list-style-type: none"> • Surat Perjanjian Kerja No. 056/UAI/SK/Pr/XI/2023 Tentang Promosi Karyawan. 	
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		<ul style="list-style-type: none"> Surat Keputusan No. 048/KAE/UAI/XI/2023 Tentang Pengangkatan Karyawan. Surat Keputusan No. 0182/UAI/XI/2023 Tentang Pengangkatan Karyawan KHL ke KHT. Memorandum No. 457/TS/III/2024, March 14, 2024, regarding Pengusulan Pengangkatan KHL Menjadi KHT. Memorandum No. 0071/GJ/I/2024 dated 14 January 2024 regarding Pengangkatan KHT. <p>Based on interviews with LKS Bipartit and workers in UAI POM, UAI POM, UAE & JMJS, KAE & SM, MAE & SB, confirmed that workers were following every step of recruitment and promotion procedures.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Based on interviews with Gender Committee, <i>LKS Bipartit</i> and workers in mill, estate and <i>Koperasi Perkebunan</i>, stated the company not conducting pregnancy tests as part of the recruitment procedure. According to them, that pregnancy tests were only conducted for pesticide applicators to avoid the employees being exposed to pesticides. Further explained that so far there had never been a pregnancy test which was a discriminatory measure.</p> <p>Pregnant or breastfeeding women are prohibited and are not allowed to work in fertilization and chemical work (spraying pesticides) or hazardous materials that contain poison. Women workers who are declared pregnant will be transferred to an alternative field that is not related to chemicals until the end of the child's breastfeeding period (2-year-old of child).</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>A gender committee PT Usaha Agro Indonesia including Extension of scope (<i>Koperasi Perkebunan Sempurna Bersatu</i>) is in place and the organizational structure period 2024 has been formed based on a decree from Mill and Estate Manager.</p> <p>- Founder: Nurcahyo Adhi Saputro</p>	Complied

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		<ul style="list-style-type: none"> - Chairman: Lia Agustina - Vice Chairman: Rosalya Sihombing - Secretary: Irvan Tabahata - UAE Coordinator: Gita with 8 members - KAE & Mill Coordinator: Lusi & Catur Kridaningtias with 10 members. - MAE Coordinator: Romasta with 7 members <p>Program of Gender Committee period of 2024</p> <ul style="list-style-type: none"> - Gender committee outreach scheduled every month. - Introduction to the main tasks and functions of the gender committee, scheduled every month. - Gender committee management meetings scheduled twice a year. - Socialization of maternal and child health, as well as providing extra food, is scheduled every month. - Socialization of clean and healthy living behavior scheduled every month. - Socialization of complaint mechanisms in the event of sexual harassment and violence as well as issues related to the reproductive rights of female workers, scheduled every month. - Socialization of the dangers of smoking for children, scheduled 3 times a year. - Socialization of handling work accidents and first aid scheduled every quarter. <p>The company shows the Minutes of Socialization of the Gender Committee, including:</p>	
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		<ul style="list-style-type: none"> - 26 January 2024 with participants attending manuring, spraying and upkeep UAE workers. - 29 August 2023 with participants attending UAE manuring, spraying and upkeep KAE workers. <p>Based on interview with representative of Gender Committee revealed that:</p> <ul style="list-style-type: none"> • Gender Committee structure and the purpose of Gender Committee have been disseminated regularly. This thing is aligned with the results of interviews with the women workers in estates that were able to describe the women workers rights such as reproduction rights, zero harassment and opportunities and equality in carriers. • Gender Committee provides information related to the sexual harassment on women especially women workers in working areas and how to report any harassment or violence to the authorities. Other than that, the gender committee is a vehicle to disseminate women's rights such as reproduction rights, avoid the sexual harassment/bullying and help them to improve their sanitation in their respective housing complexes and many more positive activities for women. 	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia has shown the document of evidence of payment as per Memorandum No.: 002/SAKR/HR/12/23 dated 2 7 December 2023.</p> <ul style="list-style-type: none"> • The memorandum was issued by HR Director to GM PT. UAI, RH PS, Estate/PKS Mgr, PS Mgr, KTU. • CC: COO, Head of Engineering, RH ABT, Head HR Opr, ICT Mgr, • Subject: Determination of PB/KHT/PKWT Wages in 2024. <p>The memorandum was explained that:</p>	Complied

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		<ul style="list-style-type: none"> As per 1st January 2024 the number of wages for KHT and PKWT is adjusted to the decision of the Governor of West Kalimantan concerning the District Minimum Wage (UMK) in 2023 in Ketapang Regency minimum wage in year 2024 (UMK/Monthly Wage is IDR 3,188,983.34, and Daily Wage is IDR 127,559.3336. The wage divider per working day is 25. As per 1st January 2024 the amount of monthly employee wages (PB) adjusts the 2024 UMK and the results of the work performance assessment during 2023. There is an Overtime Order Form which contains the following information: Date and time; Division; No. SPL, Name, Position, Overtime Hours, percentage of overtime and information. The Ketapang Regency minimum wage as referred to is the lowest monthly wage received by workers who work 40 hours a week or 7 hours a day for those who work 6 days a week or 8 hours a day for workers who work 5 days a week. The minimum wage only applies to workers/laborers with less than 1 year of service at the company concerned. <p>Sample seen for pay slip month January and February 2024. The company pays equal wages for all employees in the same scope of work. The name of each worker, level, and number of wages are recorded in detail in the document above.</p>	
Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.	Documentation of pay and working conditions in PT. Usaha Agro Indonesia was referring to Company Regulation "Peraturan Perusahaan PT. Usaha Agro Indonesia No.P/6/DISNAKERTRANS-B.500.15.12.1/	Complied

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	<p>- Critical (Major) compliance -</p>	<p>I/2023" Periodic 2023-2025; acknowledge by Ketapang Regency Manpower Office 28 January 2023.</p> <ul style="list-style-type: none"> - Chapter 7 explained Salary payment. - Chapter 9 and 10 explained Overtime rate and Overtime calculation. - Chapter 12 stipulated Working days and working hours. - Chapter 13 explained Working day dismissal due to rain. - Chapter 14 explained Holiday and religious festivities. - Chapter 15 explained Annual leave. - Chapter 16 explained Period leave, maternal leave, miscarriage leave. - Chapter 18 explained Cost of Medical/Medical treatment. - Chapter 21 explained Social insurance (BPJS Ketenagakerjaan and BPJS Kesehatan). - Chapter 27 explained Housing facility. - Chapter 28 explained Work-related Accident. - Chapter 34 explained Worker Obligation. - Chapter 36 explained Worker Rights. - Chapter 37 explained Company Obligation. - Chapter 38 explained Company Rights. - Chapter 40 explained Absentee. - Chapter 41 explained Work discipline. - Chapter 43 and 44 explained Warning and "Skors". - Chapter 45 and 46 explained Worker complaint resolution including bi-partite organization. - Chapter 47 explained Work dismissal. <p>The company regulation is available in Bahasa Indonesia.</p>	
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6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia has Company Regulation "Peraturan Perusahaan PT. Usaha Agro Indonesia No.P/6/DISNAKERTRANS-B.500.15.12.1/I/2023" Periodic 2023-2025; acknowledge by Ketapang Regency Manpower Office 28 January 2023.</p> <ul style="list-style-type: none"> - Chapter 7 explained Salary payment - Chapter 9 and 10 explained Overtime rate and Overtime calculation - Chapter 12 stipulated Working days and working hours - Chapter 13 explained Working day dismissal due to rain - Chapter 14 explained Holiday and religious festivities - Chapter 15 explained Annual leave - Chapter 16 explained Period leave, maternal leave, miscarriage leave - Chapter 18 explained Cost of Medical/Medical treatment - Chapter 21 explained Social insurance (BPJS Ketenagakerjaan and BPJS Kesehatan) - Chapter 27 explained Housing facility - Chapter 28 explained Work-related Accident - Chapter 34 explained Worker Obligation - Chapter 36 explained Worker Rights - Chapter 37 explained Company Obligation - Chapter 38 explained Company Rights - Chapter 40 explained Absentee - Chapter 41 explained Work discipline - Chapter 43 and 44 explained Warning and "Skors" - Chapter 45 and 46 explained Worker complaint resolution including bi-partite organization - Chapter 47 explained Work dismissal <p>Non-conformity</p> <p>PP 35 of 2021</p> <p>Article 15 providing compensation.</p>	Non-compliance
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		<p>(1) Employers are obliged to provide compensation money to Workers/Labourers whose employment relationship is based on <i>PKWT</i>.</p> <p>(2) The compensation money is given at the end of the <i>PKWT</i>.</p> <p>(3) Compensation money as intended in paragraph (1) is given to Workers/Labourers who have worked for at least 1 (one) month continuously.</p> <p>(4) If the <i>PKWT</i> is extended, compensation money is given at the end of the <i>PKWT</i> period before the extension and for the <i>PKWT</i> extension period, the next compensation money is given after the extension of the <i>PKWT</i> period ends or is completed.</p> <p>(5) The provision of compensation money does not apply to foreign workers employed by employers in Employment Relations based on <i>PKWT</i>.</p> <p>Article 16: Amount of compensation money;</p> <p>1. The amount of compensation money is given in accordance with the following provisions:</p> <p>a) <i>PKWT</i> for 12 (twelve) months continuously, given 1 (one) month's wages;</p> <p>b) <i>PKWT</i> for 1 (one) month or more but less than 12 (twelve) months, calculated proportionally by calculating: work period/12) x 1 (one) month Wages;</p> <p>c) <i>PKWT</i> for more than 12 (twelve) months, calculated proportionally with the calculation: (work period/12) x 1 (one) month Wage.</p>	
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		<p>Based on interviews on field trips to scratch your job disc manual block C.29 in Mae Afdeling 3, that there is a <i>PKWT</i> worker who doesn't get compensation according to the pp No. 35 years 2021.</p> <p>Workers on behalf of Meli*** who have worked for 3 years (from 2021) and have done an extension of the employment contract in 2022, but have not gotten compensation in accordance with the PP No. 35 years 2021.</p> <p>Based on interviews with KTU, that there is no compensation payment to PKWT/KHL workers after the contract workers agreement is over.</p> <p>PT UAI has issued a Memorandum through GM PT UAI No. 001/GM-UAI/III/2024 dated 21 March 21 regarding the Provision of Compensation to PKWT Workers, contains:</p> <ul style="list-style-type: none"> • Employers are obliged to provide compensation money to workers/laborers whose employment relationship is based on PKWT. • Compensation is given at the end of the PKWT. <p>However, the company has not yet identified the number of employees who are entitled to compensation in accordance with PP 35/2021.</p> <p>Based on explanation above, there is a worker with the status of PKWT/KHL who has ended of contract it works (for 2 years) but have not gotten compensation in accordance with the PP No. 35 years 2021.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Normative working condition and regulation stipulated under company regulation "Peraturan Perusahaan".</p> <p>Overtime:</p>	Complied

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		<p>In Company Regulation "Peraturan Perusahaan" Chapter 10 stated Overtime rate per hour $1/173 \times$ monthly wage. This is complied with government regulation.</p> <p>Maternity leave:</p> <p>In Company Regulation "Peraturan Perusahaan" Chapter 16 stated Company regulating the Period Leave, Maternal Leave, Miscarriage Leave.</p> <p>Holiday entitlement:</p> <p>Sampled worker UAI POM interviewed stated they entitled for holiday during religious festivities Eid Al Fitr and was able to return to their hometown.</p> <p>Based on document verification, interview with workers (harvesting workers, manuring workers, factory workers, etc.) known that there's no indication about the force labor. In addition, they get the wage accordance with the wage minimum regulation. Based on interview with harvester and wage simulation, known that harvest workers' wages are based on their work (base/target). If the worker gets the base/target, then he gets a premium, and if the worker does not get the base/target but has worked for 7 hours, then the worker gets 1 working day's wages (worth the minimum wage per day).</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The results of field observations in housing areas and interviews with workers and LKS Bipartit known that the company has provided housing facilities, infrastructure and facilities that are decent/in good condition to workers such as houses, clean water facilities, religious facilities, sports, first aid center and others. The condition of the house is permanent and has good sanitation. From the interview, also known that in each housing location their kindergarten, trash bins and others.</p>	Complied

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6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Company provided in-kind benefit in form of rice for each worker; for permanent worker 15 kg for worker; 9 kg for spouse; children 7.5 kg per children. For contract worker 0.5 kg per mandays worked.</p> <p>Company encourages employee's cooperative for provision of basic need such as cooking oil, sugar, soap, etc.</p> <p>In addition, company allows employee to plant fruit and vegetables at the back of the house 30m²: pakchoi, onion, capsicum, lettuce, pumpkin, corn, etc.</p>	Complied
6.2.6	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia paid to all workers referring to the Governor of West Kalimantan concerning the District Minimum Wage (UMK) in 2023 in Ketapang Regency, wage for year 2024 (UMK/Monthly Wage) is IDR 3,188,983.34, and Daily Wage is IDR 127,559.3336. The wage divider per day is 25 days.</p> <p>Based on interview with sample of workers and verify their payslip, it was noted that the company paid the workers following the District Minimum Wage (UMK). PT Usaha Agro Indonesia has determined details of in-kind benefit received by employees for year 2024 with 13 parameters which refer to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> • Rice supply (incl. workers, wife and children); • Housing; • Education; • Health; • Electricity; • Water supply; • Transportation; • School bus. 	Complied

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		<p>Monetary equivalent of in-kind benefits = IDR 1,746,521; Minimum wage of Ketapang = IDR 3,188,983.34; DLW for 1 family (1 worker, 1 wife, 3 children) = IDR 4,832,136; Social security (+ 4%) = IDR 5,025,422; DLW RSPO = IDR 2,951,213; Gap at IDR 2,074,209 (positive).</p> <p>Sample for in-kind benefit calculation representing five level employee status: Single, married no children, married one child, married two children and married three children.</p> <p>The calculation DLW will review annually and updated along with changes of minimum wage and cost expenses per family.</p>	
<p>PROCEDURAL NOTE:</p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on documents verification and interviews with workers during field visit, that there is the use of PKWT workers (temporary worker) on the core work.</p> <p>Based on interviews with harvest workers on the block C.28 Afdeling 3 MAE, there are workers with status PKWT/KHL:</p> <ul style="list-style-type: none"> • Worker on behalf of Da*** have been worked for more than 1 years. 	Non-compliance

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		<ul style="list-style-type: none"> Worker on behalf of Min ** the * has been working for more than 1 year <p>Based on the verification document, there is a harvesters worker with the status of PKWT (contract workers)/KHL (casual workers), as follows:</p> <ul style="list-style-type: none"> Harvesters on behalf of zainudin, harvesters in division 3 UAE, Perjanjian Kerja Waktu Tertentu dated 25 January 2024 and valid until 25 January 2026. Harvesters on behalf of zainudin, harvesters in division 2 KAE, Perjanjian Kerja Waktu Tertentu dated 18 January 2024 and valid until 18 January 2026. <p>The company has not been able to demonstrate that permanent full-time employment is used for all for all core work performed.</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.			
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. - Critical (Major) compliance -	<p>PT Usaha Agro Indonesia has established the policy recognizing freedom of association and right to collective bargaining in national languages as per "Sustainability Policy of PT Sampoerna Agro Tbk", the policy was signed by Chief Executive Officer dated 1 April 2023.</p> <p>At point 4.d. has mentioned "Protect the rights of all workers to organize and bargain collectively".</p> <p>The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities on February and March 2024 (see document of <i>Laporan Sosialisasi Kebijakan Keberlanjutan dan Visi Misi Perusahaan</i> on 17 February 2024 and 16 March 2024, takes place in UAI POM, UAE & JMJS, KAE & SM, MAE & SB includes a list of attendees and photo documentation).</p> <p>PT Usaha Agro Indonesia has established and conducted specific platform for the workers and the company's top management to meet</p>	Complied

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		<p>and discuss a specific issue with respect to the employment and its conditions, namely is the Lembaga Kerjasama Bipartit (LKS Bipartit - Joint Consultative Committee).</p> <p>LKS Bipartite Organizational Structure year 2023, i.e.:</p> <ul style="list-style-type: none"> • Company Representative: Sunarwirawan, Abdul Munif Lubis. Agung Mukhori, Yogi Hermanto, Taat Susanto, Fardomuan Aritonang, Ardiansyah, Haris Yudo PU, Dodi Fauzi, Hari Bersatu, Redye, Oktovianus Baok, Didi Istiadi, Asep Iman, Yusuf Arosyid, NUcahyo Adhi S • Workers Representative: Teguh, Agus Supriyanto, Eko Prasetyo, Catur Kridahingtias, NIspe, SYafriandi, Anita, Fajar Bakti, Tiur Marlina, Pipentius Roni, Lia Agustina, Paryono, Marlen DIlak, Siti Umi Wahyuni, Hamdia, Rutini, Yunita Pratiwi. <p>Based on interview with representative of LKS Bipartit on ASA-1.1 audit obtained information that the company has recognizing freedom of association and right to collective bargaining.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p> <p>- Minor compliance -</p>	<p>As mentioned in Act No. 13 of 2003 Article 106 (1) related Manpower which specifies that for the company employing more than 50 workers, the company shall establish the Lembaga Kerjasama Bipartit (LKS Bipartit - Joint Consultative Committee).</p> <p>PT Usaha Agro Indonesia has established and conducted the specific platform for the workers and the company's top management to meet and discuss a specific issue with respect to the employment and its conditions.</p> <p>LKS Bipartite (Joint Consultative Committee Meeting) is a coalition between the top management of the company and the workers representative. Sample of the record meeting dated 20 October 2022 was attended by 32 participants both representative of company and</p>	Complied

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		workers. Agenda: discuss related drainage in emplacement and management of domestic waste.	
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>As mentioned in Act No. 13 of 2003 Article 106 (1) related to Manpower which specifies that for the company employing more than 50 workers, the company shall establish the Lembaga Kerjasama Bipartit (Joint Consultative Committee Meeting). The workers and the company's top management to meet and discuss a specific issue with respect to employment and its conditions.</p> <p>PT Usaha Agro Indonesia has established and conducted the specific platform for the workers and the company's top management to meet and discuss a specific issue with respect to the employment and its conditions.</p> <p>LKS Bipartite Organizational Structure year 2023, i.e.:</p> <ul style="list-style-type: none"> • Company Representative: Sunarwirawan, Abdul Munif Lubis. Agung Mukhori, Yogi Hermanto, Taat Susanto, Fardomuan Aritonang, Ardiansyah, Haris Yudo PU, Dodi Fauzi, Hari Bersatu, Redye, Oktovianus Baok, Didi Istiadi, Asep Iman, Yusuf Arosyid, Nurcahyo Adhi S • Workers Representative: Teguh, Agus Supriyanto, Eko Prasetyo, Catur Kridahingtias, NIsipi, SYafriandi, Anita, Fajar Bakti, Tiur Marlina, Pipentius Roni, Lia Agustina, Paryono, Marlen DIlak, Siti Umi Wahyuni, Hamdia, Rutini, Yunita Pratiwi. <p>Minutes of Meeting the LKS Bipartite in December 2023, attended by administrators and members of the LKS Bipartite, with discussions regarding incomplete PPE for harvest workers, incomplete first aid kits for foremen, cleanliness of employee housing and hazardous waste found in employee housing. In the meeting it was determined that follow-up actions would be carried out in December 2023 and January</p>	Complied

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		<p>2024.</p> <p>Semester II of 2023 LKS Bipartite Report was reported to the Manpower Agency of Ketapang Regency with Letter Number 02/MSK/XII/2023 dated 30 December 2023.</p> <p>Semester I of 2023 LKS Bipartite Report was reported to the Manpower Agency of Ketapang Regency with Letter Number 02/MSK/VI/2023 dated 30 June 2023</p> <p>Based on interview with representative of LKS Bipartit (date 13th June 2023) obtained information that management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers.</p>	
Criteria 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Code of ethical conduct included in "<i>Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk.</i>" Signed by CEO 1 April 2023. The policy No.4 stipulated commitment to respect human rights as per human rights declaration and human rights defender declaration by the United Nation, including section 4.c Not employ worker under 18 years old.</p> <p>The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities on February and March 2024 (see document of <i>Laporan Sosialisasi Kebijakan Keberlanjutan dan Visi Misi Perusahaan</i> on 17 February 2024 and 16 March 2024, takes place in UAI POM, UAE & JMJS, KAE & SM, MAE & SB includes a list of attendees and photo documentation</p>	Complied

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6.4.2	<p>(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia has Company Regulation "Peraturan Perusahaan PT. Usaha Agro Indonesia No.P/6/DISNAKERTRANS-B.500.15.12.1/I/2023" Periodic 2023-2025; acknowledge by Ketapang Regency Manpower Office 28 January 2023. Chapter I, Verse 4, "Persyaratan Penerimaan Pekerja" – employment requirement stated in point 2: minimum age 18 years old.</p> <p>Verified with sampled worker interviewed, they admitted upon submitting job application form, company ask them to attach copy of personal ID to check the minimum 18 years old age.</p>	Complied
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>In the context of oil palm plantations of RSPO members in Indonesia, young workers are not recognized, but some students carry out fieldwork practices at the palm oil plantations to meet the learning curriculum requirements as referred to in Article 70 of Act No. 13 of 2003 concerning Manpower. Related to it, the company does not accept students from outside plantations/mill who do field work practice (apprenticeship) in mill and estate.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Code of ethical conduct included in "<i>Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk.</i>" Signed by CEO 1 April 2023. The policy No.4 stipulated commitment to respect human rights as per human rights declaration and human rights defender declaration by the United Nation, including 4.c Not employ worker under 18 years old.</p> <p>The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities on February and March 2024 (see document of <i>Laporan Sosialisasi Kebijakan Keberlanjutan dan Visi Misi Perusahaan</i> on 17 February 2024 and 16 March 2024, takes place in UAI POM, UAE & JMJS, KAE & SM, MAE & SB includes a list of attendees and photo documentation. In the contract, company and contractor agreed to put clause on meeting legal requirement and prohibit use of child worker.</p>	Complied

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Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Policy to prevent sexual and all other form of harassment and violence is included in "<i>Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk.</i>" Signed by CEO 1 April 2023. The policy No.4 stipulated commitment to respect human rights as per human rights declaration and human rights defender declaration by the United Nation, including: 4.e. Prevent sexual harassment and sexual abuse/violence for all worker, and to protect reproductive rights, in particular female worker.</p> <p>The policy has been socialized to all level workforce on February and March 2024 (see document of <i>Laporan Sosialisasi Kebijakan Keberlanjutan dan Visi Misi Perusahaan</i> on 17 February 2024 and 16 March 2024, takes place in UAI POM, UAE & JMJS, KAE & SM, MAE & SB, includes a list of attendees and photo documentation).</p> <p>Based on the review of the complaint, grievance and communication logbook, and interview with gender committee representatives, and workers at Mill and Estate, there is no case of sexual and all other forms of harassment and violence in the workplace being reported.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Policy to protect the reproductive rights of all, especially of women, is included in "<i>Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk.</i>" Signed by CEO 1 April 2023. The policy No.4 stipulated commitment to respect human rights as per human rights declaration and human rights defender declaration by the United Nation, including: 4.e. Prevent sexual harassment and sexual abuse/violence for all worker, and to protect reproductive rights, in particular female worker.</p> <p>The policy has been socialized to all level workforce on February and March 2024 (see document of <i>Laporan Sosialisasi Kebijakan Keberlanjutan dan Visi Misi Perusahaan</i> on 17 February 2024 and 16 March 2024, takes place in UAI POM, UAE & JMJS, KAE & SM, MAE & SB, includes a list of attendees and photo documentation).</p>	Complied

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		Based on interview with sampled female worker in UAI POM, UAE & JMJS, KAE & SM, MAE & SB, they understand their reproductive rights need to be protected, and they have rights for maternal leave, period leave (during menstruation).	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>The company has identified female workers as new mothers and made assessments their need based on consultation with them (for example see document of <i>Form Penilaian Kebutuhan Ibu-Ibu Muda/Bersalin Sampoerna Agro</i>, 18 December 2023. Records shown during the audit are:</p> <ul style="list-style-type: none"> - List of New Mothers, - Example of Questionnaire for new mother (New Mother needs and their expectation for support from the company) on behalf of SM (clerk of Division 03 UAE) <p>The New Mother assessment result rise main expectations e.g.:</p> <ul style="list-style-type: none"> - Childcare facilities for workers who stay outside the company's housing facilities. - Breast Feeding room in Childcare facility. - Moving the working area closer to a childcare facility <p>An observation of housing facilities at the estate and mill found that both already have a good childcare facility which has a breastfeeding room. Interview results with childcare workers confirmed that all the female workers could easily access the childcare and use the breastfeeding room. Interview with female workers and gender committee representative confirmed that the company still provide good support to new mothers' need.</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.	The company has prepared Whistleblowing Policy PT. Sampoerna Agro Tbk., dated 27 September 2013. Through email address and letter to PT. Sampoerna Agro Tbk., Sampoerna Strategic Square North Tower, 28 th Floor Jl. Jend. Soedirman Kav.45 Jakarta 12930, Indonesia. Section	Complied

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	- Minor compliance -	<p>5.2 stated identity of complainant will be kept confidential. Section 6 prohibit hindering action/retaliatory action.</p> <p>Minutes of the Whistleblowing Policy Socialization on 16 March 2024 which was attended by Staff, Foremen, Employees, Meranti Agro Estate Division 1, 2 and 3 Sustainability teams.</p> <p>Based on interview with sampled female worker in UAI POM, UAE & JMJS, KAE & SM, MAE & SB, they understand the threat of sexual harassment and understand who to report if such case occurs – to gender committee in each estate go to clinic’s midwives as the gender committee representative.</p>	
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Based on interview with loose fruit collectors in UAI POM, UAE & JMJS, KAE & SM, MAE & SB, they came to the company location from another province (Jawa Tengah Province, Nusa Tenggara Timur Province); they admitted the company use agent when they hired in their origin. The hiring practices is explained clearly when the agent engage: the work offered for loose fruit collector and upkeep manpower, explained the company will pay refer to minimum wage, explained the worker will be hired as temporary worker at first but can be appointed as permanent worker based on performance, explained the worker will be provided with housing and the infrastructure (electricity, clean water) for free. The worker admitted they did not pay anything for travelling expense or recruitment fee, no levy paid, no wage deduction, no withholding ID card, no penalty upon resignation.</p>	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>- Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia has contract worker recruitment procedure “Sampoerna Agro Integrated Management System Procedure Rekrutmen No.P-SAG-ADM-KTU-04 r2” dated 1 March 2018. Section 7.7 stipulated recruitment process cost paid by company based on request</p>	Complied

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		<p>from GM to Head of Financial Accounting. Section 7.9 stipulated the contract between Unit Head and each contract worker.</p> <p>PT Usaha Agro Indonesia has demonstrated the revised the document of <i>Pekerja Waktu Tertentu</i>, namely Mr Kristina, as per document "Perjanjian Kerja Waktu Tertentu", namely Mrs Kritina (address Sungai Danau Village) and on behalf company is Estate Manager in Ulin Agro Estate. In Article 1 mentioned that Mrs Kristina as Contract Workers, valid until 4th March 2024.</p> <p>Based on result of interview with sample employee during ASA-1.1 audit example: Mrs Wiwik Kardasih (in Ulin Estate, as manual weeding worker), Mrs Mahmudah (in Kruing Estate, pesticides applicator), Mrs Sariya (in Kruing Estate, as pesticides applicator) they have confirmed that all employees have a Specific Time Work Agreement document.</p>	
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The responsible in health and safety has been established in accordance with the legal requirements, that is OHS Committee (<i>Panitia Pembina Keselamatan dan Kesehatan Kerja/P2K3</i>) that has been approved by Manpower Agency, and the Secretary is OHS Expert. "Struktur Organisasi Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3)", period 2023 the structure are as follow:</p> <ul style="list-style-type: none"> • Chairman : Fardomuan Aritonang (GM PT UAI) • Vice Chairman : Abdul Munif Lubis (MM UAI POM) • Secretary : Haris Yudho Prasetyo, Nurcahyo Adhi Saputro • Coordinator of OHS : Taat Susanto • Coordinator of Environment : Sunawirawan • Coordinator of PPE Monitoring: Ricky Erwanto • Coordinator of First Aid : Dodi Fauzi 	Complied

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		<ul style="list-style-type: none"> Coordinator of EHS Training : Ahmad Bustami <p>Available Safety Officer license - "Kartu Tanda Kewenangan Ahli K3 Umum" No.93616/PK3/AJ/31/2021/P0, dated 29 Jan 2021, named Nurchayo Adhi Saputro, valid until 29 Jan 2024 (Letter Number 02/PT UAI-EXT/PP/V/2024 dated 13 May 2024 regarding application for extension of SKP and OHS Expert License in the name of Nurcahyo Adhi Saputro addressed to the Director of PNK3, Directorate General of Labor Inspection Development, Ministry of Manpower and Transmigration of the Republic of Indonesia).</p> <p>The safety committee (P2K3) regular meeting has been performed each month, discussed regarding OHS plan program achievement and corrective actions to achieve target and improve the program such as Personal Protective Equipment (PPE), hazard from animal, safety notes, accidents etc. The actions were monitored for realization and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed at the meeting such as: review of accident, PPE Checklist update, result of internal audit, incident investigation, etc. Samples of document that has been reviewed during audit such as meeting on 20 February 2024.</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The company shows emergency and work accident response procedures which are documented in Indonesian and are listed in:</p> <ul style="list-style-type: none"> Sampoerna Agro Integrated Management System Procedure <i>Kesiagaan & Tanggap Darurat di Kebun</i> (No. P-SAG-KBN-DRR-01, Rev.03, dated 01 April 2023) signed by Chief Executive Officer. Sampoerna Agro Integrated Management System Procedure <i>Pengendalian Kebakaran Lahan dan Perkebunan</i> (No. P-SAG-KBN-DRR-02, Rev.1, dated 01 April 2023) signed by MR Corporate and Chief Executive Officer. 	Complied

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		<ul style="list-style-type: none"> Sampoerna Agro Integrated Management System Procedure <i>Pelaporan dan Perhitungan Statistik Kecelakaan Kerja</i> (No. P-SAG-HO-SUS-14, Rev. 0, dated 01 July 2023) signed by Chief Executive Officer. <p>The company has also provided first aid training to the workers assigned to the field and other work locations. The company has shown recordings of first aid training, for example training on 15 March 2024 (KAE and Koperasi Perkebunan Sempurna Mandiri), 15 March 2024 (UAE & Koperasi Perkebunan Jambi Mekar Jaya Sempurna) and 14 March 2024 (MAE & Koperasi Perkebunan Sempurna Bersatu). In addition, based on interviews with paramedics at polibun, known that paramedics have hyperkes certificate. Furthermore, the company also shown record of all accident and based on the record, known that there were only minor accidents and no serious or fatality accidents in the last 1 year.</p> <p>First aid kits are available on site, with contents as referred to Minister of Manpower Decree No. 15 in 2008. The records of all accidents kept and periodically reviewed during monthly meeting of P2K3. during field visit to Mill and estate, the auditor found some Signboard of evacuation routes in process area and road (around ditch) has been satisfactory managed and maintained, first aid kits was complete, and hydrant nozzle connection was good during testing.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The company has defined standard of PPE for all operations, processes, and activities as seen on document Memorandum of Managing Director No. 076/MD/VI/2016, dated 22 June 2016, regarding PPE providing and lifetime of PPE, and document of "<i>Penetapan Standar Alat Pelindung Diri (APD) Berdasarkan Umur Pakai</i> (Life-Time).</p> <p>Based on field observation at harvesting activity, known that workers have used PPE according to company standards. In addition, based on</p>	Complied

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		<p>interview with workers such as harvester, spraying worker, mill workers also explained that if the PPE is damaged, the worker can report it to the foreman to ask for the replacement of the PPE including PPE with short lifetime, such as gloves and mask, this is also indicated by the availability of sufficient PPE stock in the PPE storage warehouse which aims to replace if any PPE is found that is damaged or does not provide optimal protection.</p> <p>Based on the field visit to the rinse house, it is known that there is a storage area for PPE and spraying equipment as well as sanitation facilities for employees after the spraying work is completed. Based on the results of field visits and interviews with workers, it is known that workers have used PPE completely and company management always monitors workers regularly regarding the use of PPE properly and correctly</p>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>The company shows the records/documents:</p> <ul style="list-style-type: none"> • <i>Tagihan</i> 02620110202402 (<i>BPJS Kesehatan</i> KAE) with 181 participants • <i>Tagihan</i> 02620107202402 (<i>BPJS Kesehatan</i> MAE) with 99 participants • <i>Tagihan</i> 02620108202402 (<i>BPJS Kesehatan</i> UAE) with 231 participants • <i>Rincian Iuran Ketenagakerjaan BPJS Ketenagakerjaan</i> KAE for February 2024, with a total membership of 12 PB, 219 KHT, 239 KHL. • <i>Rincian Iuran Ketenagakerjaan BPJS Ketenagakerjaan</i> MAE for February 2024, with a total membership of 4 PB, 141 KHT, 4 KHL. 	Non-compliance

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		<ul style="list-style-type: none"> <i>Rincian Iuran Ketenagakerjaan BPJS Ketenagakerjaan UAE for February 2024, with a total membership of 3 PB, 103 KHT, 5 contracts.</i> <p>Based on field visits and interviews with own estates and scheme smallholders workers with PKWT/KHL status, stated that workers had not been registered for <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>.</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>The company's approach to safety is evident through its accident recording procedures. A document review revealed that the company uses a specific form, known as "Laporan Kecelakaan Kerja" (Ref: FM-SAG-ADM-KTU-050006), to document any accidents that occur within its working premises.</p> <p>All reported accidents have been recorded using the Lost Time Accident (LTA) metrics, a reliable standard for measuring workplace safety. This record-keeping system is maintained on a monthly basis, demonstrating the company's commitment to transparency and accountability in safety management.</p> <p>Upon reviewing the work accident recapitulation for the period spanning from January to March 2024, it is noteworthy that there were no reported cases of occupational injuries during this period.</p>	Complied
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	<p>The unit of certification has a well-documented procedure in place for the monitoring and management of Integrated Pest Management (IPM). During this audit ASA1.1 there is no change in documented procedure for IPM. During the audit, it was reviewed several elements of procedure, including:</p>	Complied

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		<ul style="list-style-type: none"> • Pest Monitoring - Monitoring Hama (P-SAG-KBN-PML-15), revision 03, dated 01/09/2017. • Leaf Defoliator Pest Handling - Pengendalian Hama Daun (P-SAG-KBN-PML-16), revision 02, dated 02/03/2015. • Rat Handling - Pengendalian Hama Tikus (P-SAG-KBN-PML-18), revision 01, dated 16/03/2012. • Tiratabha Handling - Pengendalian Hama Tirataba (P-SAG-KBN-PML-17), revision 01, dated 16/03/2012. • Introduction and Expansion for <i>Tyto alba</i> - Introduksi dan Pengembangan <i>Tyto alba</i> (P-SAG-KBN-PML-19), revision 01, dated 16/03/2012. <p>Additionally, PT UAI estates follows a best practice of establishing a census program for pest control within its estates. This program is documented in the "<i>Rencana dan Realisasi Monitoring Hama 2023 & 2024</i>". According to the established monitoring and census program, the certification unit conducts pest identification on a monthly basis. During the audit, available records of monthly pest identification "<i>Deteksi Hama</i>" and "<i>Sensus Oryctes</i>", Pest monitoring particularly for rats, Oil palm leaf eating caterpillar and oryctes at MAE, UAE and KAE. Sample seen for pest monitoring and census periode October 2023 – February 2024. Should any pest outbreak issues be detected, a census is promptly carried out. The results of these censuses play a crucial role in informing management decisions regarding pest control strategies.</p> <p>To support these efforts, "<i>Buku Pengamatan Hama Tikus</i>" (LBB-SAG-KBN-PML-150401) and "<i>Form Ringkasan Sensus Hama Dauri</i>" (F-SAG-KBN-PML-150201), the templates for census monitoring, were established.</p> <p>It is noteworthy that as of the audit date, there has been no significant outbreak of pests within the certification unit. Consequently, there has</p>	
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		<p>been no requirement for the use of chemical treatments, and no prophylactic pesticide use was identified.</p> <p>Training related to IPM census practices has been conducted and well-documented (dated 14 March 2024). This reflects the certification unit's commitment to ensuring a highly competent workforce for pest management.</p> <p>Furthermore, the certification unit has undertaken the cultivation of beneficial plants such as <i>Turnera subulatta</i>, <i>Antigonon leptopus</i>, and <i>Casia cobanensis</i> across all three estates. During field observation confirmed that these beneficial plants have been successfully planted throughout the estates and are being well-maintained. This proactive approach aligns with the principles of IPM and contributes to the overall sustainability and ecological balance within the estates. Beside that to control the rats attack company also develop and provided the <i>Tyto alba</i> nest to conserve <i>Tyto alba</i> as natural enemy of rats. Each 25 ha company provide 1 nest of <i>Tyto alba</i>. Monitoring record of <i>Tyto alba</i> are available and was sighted during audit.</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Based on document review and field observation during audit ASA1.1, the Unit of Certification implement some biological control practices to suppress pest and diseases infestation such as <i>Turnera subulata</i> and <i>Antigonon leptopus</i>, as well as use barn owl (<i>Tyto alba</i>). Verification results on website of cabi.org has known that these species stated as not invasive in Indonesia.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on review of pest and disease procedure, field observation, interview with management and stakeholders, has known that the Unit of Certification never used fire for pest control.</p>	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			

7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Justification method of pesticides has been set in procedure of Weed Management - Pengendalian Gulma TBM (P-SAG-KBN-PML-22) and (P-SAG-KBN- PML-12), such as that have specific to the target (narrow spectrum), and has minimum negative impact on non-target species, as well as legally registered in Pesticide Commission, Ministry of Agriculture.</p> <p>Unit of Certification has a Pesticide Recommendation of 2023/2024 made by R&D Department, that is the summary of recommended pesticides based on consideration of specific target, active ingredient, WHO Class, trademark and priority. These pesticides consist of herbicides, insecticides, rodenticides, and fungicides. Based on the list, these pesticides are only classified as WHO Class II, III, and IV, as well as have been registered in National Pesticides Commission based on verification in website of https://pestisida.id/.</p> <p>Based on field observation on agrochemical storage and activity of spraying of circle and path, noted that there was no usage of WHO Class I pesticides, the workers have demonstrated that spraying only applied to the specific area and weeds by knapsack sprayer.</p> <p>Below are the pesticide use by PT UAI in 2023/2024:</p> <table><tr><th>Pesticide Name</th><th>Active Ingredients</th><th>Weeds Target</th><th>WHO classification</th><th>Registration number</th></tr><tr><td>Meta Prima</td><td>Metil metsulfuron</td><td>broadleaf weeds</td><td>Category U, it is possible that pesticides will not cause harm if used normally</td><td>RI 01030119991 484</td></tr><tr><td>Prima up</td><td>Isoprofil glifosat</td><td>narrow-leaved weeds, sedges, and gajahan grass</td><td>Category U, it is possible that pesticides will not cause</td><td>RI 01030120031 779</td></tr></table>	Pesticide Name	Active Ingredients	Weeds Target	WHO classification	Registration number	Meta Prima	Metil metsulfuron	broadleaf weeds	Category U, it is possible that pesticides will not cause harm if used normally	RI 01030119991 484	Prima up	Isoprofil glifosat	narrow-leaved weeds, sedges, and gajahan grass	Category U, it is possible that pesticides will not cause	RI 01030120031 779	Complied
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					harm if used normally		
		Garlon 480 EC	Triklopir butoksi etil estaer	Clidemia hirta, Solanum sp.	Category II, moderate danger	RI 01030119846 95	
		Starane 290 EC	Flouroxypyr Methyl ethyl ester	shrubs, hard and woody weeds	Category II, moderate danger	RI 01030119888 54	
		Emutan LVA	Emultan LVA	Emulgator	-	-	
		Lifeline 280 SL	Amonium glufosinat	broadleaf weeds and narrow-leaved weeds	Category III, Mild danger	RI 01030120175 849	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has implemented a pesticides application program for each estate, clearly demonstrated through the comprehensive Upkeep Program known as "<i>Rencana dan Realisasi Penggunaan Pestisida 2023/2024</i>". This program is thoughtfully organized and structured, with details tabulated according to Field Number, Chemical Type, Month Program, and Date of Realization.</p> <p>The routine application of pesticides primarily targets weed control within circles and pathways, with a frequency of every four months as deemed necessary. To ensure accurate and transparent documentation of pesticide usage, the unit maintains a dedicated set of records known as "Pesticide Toxicity for Estate". These documents contain essential information such as product names, active ingredients, LD50 (lethal dose for 50% of a test population), the percentage of active ingredients, total applications, total active ingredients, hectare-wise application, and active ingredients per hectare applied. These records provide an overview of pesticide usage within the estate, facilitating effective monitoring and evaluation.</p>					Complied

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		<p>Below are the recap of pesticide use including active ingredients, total area application and LD50 unit in 2023 (Jan – Dec):</p> <p>Keruing Agro Estate:</p> <table><tr><th>Pesticide name</th><th>Active ingredients (AI)</th><th>Chemical usage (Kg/L)</th><th>A.I used</th><th>Total area application</th><th>Pesticide toxicity unit (kg/LD50/ha)</th></tr><tr><td>Meta Prima</td><td>Metil metsulfuron</td><td>161.68</td><td>32.34</td><td>6,457.41</td><td>0.000005008</td></tr><tr><td>Prima up</td><td>Isoprofil glifosat</td><td>1,392.48</td><td>417.74</td><td>6,457.41</td><td>0.000043128</td></tr><tr><td>Garlon 480 EC</td><td>Triklopir butoksi etil estaer</td><td>16.60</td><td>7.92</td><td>6,457.41</td><td>0.000001737</td></tr><tr><td>Starane 290 EC</td><td>Flouroxypyr Methyl ethyl ester</td><td>95.24</td><td>27.62</td><td>6,457.41</td><td>0.000007374</td></tr><tr><td>Emutan LVA</td><td>Emultan LVA</td><td>8.82</td><td>7.06</td><td>6,457.41</td><td>0.000000683</td></tr><tr><td>Lifeline</td><td>Amonium glufosinat</td><td>844.05</td><td>675.24</td><td>6,457.41</td><td>0.000065355</td></tr></table> <p>Meranti Agro Estate:</p> <table><tr><th>Pesticide name</th><th>Active ingredients (AI)</th><th>Chemical usage (Kg/L)</th><th>A.I used (kg/L)</th><th>Total area application</th><th>Pesticide toxicity unit</th></tr><tr><td>Meta Prima</td><td>Metil metsulfuron</td><td>206.07</td><td>41.21</td><td>15,883.15</td><td>0.000002598</td></tr><tr><td>Prima up</td><td>Isoprofil glifosat</td><td>3,208.57</td><td>962.57</td><td>15,883.15</td><td>0.000040453</td></tr></table>	Pesticide name	Active ingredients (AI)	Chemical usage (Kg/L)	A.I used	Total area application	Pesticide toxicity unit (kg/LD50/ha)	Meta Prima	Metil metsulfuron	161.68	32.34	6,457.41	0.000005008	Prima up	Isoprofil glifosat	1,392.48	417.74	6,457.41	0.000043128	Garlon 480 EC	Triklopir butoksi etil estaer	16.60	7.92	6,457.41	0.000001737	Starane 290 EC	Flouroxypyr Methyl ethyl ester	95.24	27.62	6,457.41	0.000007374	Emutan LVA	Emultan LVA	8.82	7.06	6,457.41	0.000000683	Lifeline	Amonium glufosinat	844.05	675.24	6,457.41	0.000065355	Pesticide name	Active ingredients (AI)	Chemical usage (Kg/L)	A.I used (kg/L)	Total area application	Pesticide toxicity unit	Meta Prima	Metil metsulfuron	206.07	41.21	15,883.15	0.000002598	Prima up	Isoprofil glifosat	3,208.57	962.57	15,883.15	0.000040453	
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		Garlon 480 EC	Triklopir butoksi etil estaer	59.02	28.33	15,883.15	0.000002514
		Starane 290 EC	Flouroxypyr Methyl ethyl ester	16.04	4.65	15,883.15	0.000000506
		Emutan LVA	Emultan LVA	14.21	11.37	15,883.15	0.000000448
		Lifeline	Amonium glufosinat	486.38	389.10	15,883.15	0.000015331
		Ulin Agro Estate:					
		Pesticide name	Active ingredients (AI)	Chemical usage (Kg/L)	A.I used (kg/L)	Total area application	Pesticied toxicity unit
		Meta Prima	Metil metsulfuron	95.79	19.16	5,184.35	0.000003710
		Prima up	Isoprofil glifosat	1,547.43	464.23	5,184.35	0.000059927
		Garlon 480 EC	Triklopir butoksi etil estaer	1.00	0.48	5,184.35	0.000000131
		Starane 290 EC	Flouroxypyr Methyl ethyl ester	0.63	0.18	5,184.35	0.000000061
		Emutan LVA	Emultan LVA	18.31	14.65	5,184.35	0.000001773
		Lifeline	Amonium glufosinat	392.83	314.25	5,184.35	0.000038033

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		<p>Furthermore, detailed records of pesticide usage are consolidated and made available in the GHG (Greenhouse Gas) Data report, which was presented to the audit team. This report includes comprehensive information regarding the active ingredients used and the quantities of each active ingredient applied. Notably, the pesticide usage is documented for various blocks within the estates, ensuring that the management has a view of pesticide application across different areas.</p> <p>By maintaining transparent and comprehensive records of pesticide usage, the unit of certification ensures that its actions align with environmentally principles and contribute to the overall sustainability and health of its estates.</p>	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>IPM plan has been carried out effectively, therefore there was no chemical use for pest control, with exception for routine weed control. The IPM Procedure stated for early warning system (pest detection), has been set the economic threshold for pests, and chemical treatment only will be used if the pest infestation exceeds the economic threshold. These IPM strategies aimed to minimize pesticide usage.</p> <p>PT UAI has develop the integrated pest management programme. To minimize and eliminated the use of chemical for pest control, company has develop the beneficial plant (<i>Turnera subulata</i>, <i>Casia conabensis</i> and <i>Antigonon leptopus</i>) to prevent the leaf etaer caterpillar pest, <i>Tyto alba</i> nest and natural enemy conservation (such as: snake and eagle) as natural enemy for rats.</p> <p>Pesticides were used regularly only for weed control in the circle and harvesting path with interval every 4 months if necessary. The usage of pesticides has been monitored in monthly and annual basis. If the conditions of circle and harvesting path are still quite standard, the weed control will be postponed.</p>	Complied

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7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines. - Minor compliance -	Based on document review, field observation, interview with management and stakeholder, it was noted that the Unit of Certification never uses pesticides prophylactically. If the conditions of circle and harvesting path are still quite standard, the weed control will be postponed. Based on observation of spraying activities, the application method was not a preventive application, but rather selective for locations that have weeds.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: - Minor compliance - 7.2.5a Judgment of the threat and verify why this is a major threat.	Based on document review, the Unit of Certification did not use WHO 1A, 1B pesticides or paraquat since 2019, or pesticide that prohibited by the government as mentioned in Annex II Regulation of Ministry of Agriculture No 39 year of 2015 about Pesticide Registration, for example aldrin, formaldehyde, and monokrotofos. There was Internal Memo "Penghentian Pemakaian Paraquat dan Bahan Kimia yang Dilarang Penggunaannya Berdasarkan Ketentuan RSPO" (Ref.: 124/DRD/XI/2019, dated 15 November 2019), distributed by R&D Director to all relevant personnel regarding the commitment not to use paraquat anymore since November 2019. During audit ASA 1.1 based on field visits (spraying activities) and observations at the pesticide warehouse at MAE, KAE and UAE, that there was no use of pesticides with the active ingredient paraquat or pesticide categorized as WHO Class 1A or 1B."	Complied
	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.	
	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.	

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	7.2.5d Process to limit the negative impacts of the application.	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	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has taken proactive measures to ensure the safety and competence of its workforce through the implementation of the "Program <i>Pelatihan Tahun 2023/2024</i>", a training program designed to address safety and awareness in the handling of pesticides. In response to this training initiative, the certification unit has successfully conducted multiple training sessions, and the corresponding training records have been documented in the "<i>Rekap Pelatihan Individu Tahun 2023/2024</i>". This record-keeping serves as a resource for tracking individual training progress. Latest training of pesticide handling for spraying workers has been conducted on 14 March 2024.</p> <p>During audit field visit to spraying activity are conducted in Ulin Agro Estate, Keruing Agro Estate and Meranti Agro Estate. It was noted that spraying workers were using appropriate PPE such as face cover, rubber gloves, apron, and rubber boots. Medical surveillances were regularly conducted, and evidence can be shown by the Unit of Certification. There is no worker under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions.</p> <p>Material safety datasheet for pesticide applied are available and understood by workers.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	PT Usaha Agro Indonesia has a pesticide storage. Location of the pesticide storage in Each Estate.	Complied

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		<p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemical's storage was locked in areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spillage was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area. Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> <p>Based on field visit to agrochemical storage, the unit of certification has stored all pesticides properly. Each pesticide product equipped with MSDS. The storage also provided PPE's, hand/eye wash facilities and first aid kit. Each pesticide/herbicide stored separated with its level of toxicity, material and its use. Agrochemical material stored at specific warehouse.</p>	
7.2.8	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia including Extension of Scope (Koperasi Perkebunan Sempurna Bersatu) has procedures for handling used pesticides containers in "<i>Identifikasi Limbah dan Pengendaliannya</i>" which has specified the disposal method for solid waste generated. Sighted in the document, the company has outlined that all used pesticide containers shall be collected and kept at the hazardous waste temporary storage prior transporting to the authorized disposal centre.</p> <p>Permit for temporary hazardous waste storage was based on Decree of Ketapang Regent No. 623/KLH-B/2016, dated 7 Oct 2016, regarding "<i>Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun</i>"</p>	Complied

		<p><i>Kepada PT Usaha Agro Indonesia</i>". Available as well Decree of Environmental Agency of Ketapang Regency No.P/2614/PERKIMLH-D.660.1/XI/2021, dated 23 Nov 2021, regarding "<i>Rincian Teknis Penyimpanan Limbah Bahan Berbahaya dan Beracun (Limbah B3) PT Usaha Agro Indonesia</i>".</p> <p>The company has Agreement No. 882/UAI/XII/23/HQ/CA, dated 1 Dec 2023, between PT Balikpapan Environmental Services, a hazardous waste processor, PT Semesta Langgeng Sentosa, as hazardous waste transporter, and PT Usaha Agro Indonesia, as hazardous waste producer. The agreement valid until 1 Dec 2024.</p> <p>The company adheres to responsible practices when disposing of empty chemical containers. These containers are managed through approved Solid Waste (SW) collectors, which have received the official endorsement of the local government as recognized hazardous storage waste collectors. This commitment to proper disposal procedures is clearly documented in the Company Profile of PT Semesta Langgeng Sentosa, which is designated as a hazardous waste transporter.</p> <p>Upon field observation of the temporary hazardous storages at UAI POM and Keruing Agro Estate, it is confirmed that the waste/chemical containers have been segregated in accordance with their characteristics, as specified in the relevant regulations and/or instructions on the packaging. The input and output of waste (disposed of by authorized companies) have been meticulously documented in the waste logbook.</p> <p>It was observed sample of disposal manifest of pesticide container of PT UAI No. KLHK-1689807354 dated 19 May 2023, amount of 0.5662 tons of pesticide containers (B104d). Available as well disposal manifest of pesticide container of PT UAI No. KLHK-1689807499 dated 19 May 2023, amount of 0.11 tons of pesticide containers (B104d). Both received by PT Semesta Langgeng Sentosa.</p>	
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7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	Based on interview with Estate Management, surrounding community and field observation, there was no pesticide applied aerially in whole are of certificate holder.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	The company has been conducted specific annual medical (Cholinesterase) to all pesticide operators and fertilizer operator carried out on 20 and 21 November 2023 with all results being normal. Based on interview with spraying worker, it is known that all workers are in good condition.	Complied
7.2.11	(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives. - Critical (Major) compliance -	Based on interview with pesticides applicator known that there was no worker age under 18 years old or pregnant and breastfeeding worker worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. If there was a worker detected pregnant, she will be transferred to the place not related with chemical material.	Complied
Note For 7.2.11 Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.			
Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
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. - Minor compliance -	The document " <i>Identifikasi Sumber Limbah & Pengendaliannya</i> " is in place, and it clearly outlines aspects related to waste management. This document specifies the sources of waste, categorizes, waste types, identifies the form of waste generated, and defines the appropriate actions to be taken for handling each type of waste. These actions may include recycling, reuse, or disposal to the landfill. Here are some examples of identified waste and their actions:	Non-compliance

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		<ul style="list-style-type: none"> Scheduled waste (from fertilizer storage, chemical storage, POL storage, etc.) – to be disposed of through an appointed scheduled waste collector. Organic waste (from housing, office, etc.) – to be disposed of in a landfill. Inorganic waste (from housing, office, workshop, worship place, etc.) – some are to be disposed of in a landfill, while others are suitable for reuse. <p>Additionally, the certification unit has established specific procedures to manage waste effectively:</p> <ul style="list-style-type: none"> <i>"Pengendalian Limbah di Kebun"</i> (Waste Management in the Plantation) - Procedure No. P-SAG-KBN-LMB-01, dated 30 October 2015. <i>"Penanganan B3 dan Limbah di PKS"</i> (Handling of Hazardous and Non-Hazardous Waste in the Palm Oil Mill) - Procedure No. P-SAG-PKS-LMB-01, dated 1 September 2017. <p>These procedures provide clear guidance on how waste is managed in both the plantation and the palm oil mill, ensuring compliance with regulations and promoting responsible waste handling and disposal practices.</p> <p>Record of hazardous and toxic waste's disposal in PT Usaha Agro Indonesia as per handover manifest of hazardous waste, such as dated 19 May 2023, handed over to PT Semesta Langgeng Sentosa, truck KH 8718 GN, consisted of:</p> <table border="1"> <thead> <tr> <th>Type of hazardous waste</th><th>Code</th><th>Volume (tons)</th><th>Electronic manifest</th></tr> </thead> <tbody> <tr> <td>Ex-Pesticides container</td><td>B104d</td><td>0.5662</td><td>KLHK-1689807354</td></tr> <tr> <td>Ex-Pesticides container</td><td>B104d</td><td>0.11</td><td>KLHK-1689807499</td></tr> <tr> <td>Clinic waste</td><td>A337-1</td><td>0.0301</td><td>KLHK-1690250692</td></tr> </tbody> </table>	Type of hazardous waste	Code	Volume (tons)	Electronic manifest	Ex-Pesticides container	B104d	0.5662	KLHK-1689807354	Ex-Pesticides container	B104d	0.11	KLHK-1689807499	Clinic waste	A337-1	0.0301	KLHK-1690250692	
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		<table border="1"> <tr> <td>Used rags</td><td>B110d</td><td>0.1044</td><td>KLHK-1689806337</td></tr> <tr> <td>Used rags</td><td>B110d</td><td>0.016</td><td>KLHK-1689806607</td></tr> <tr> <td>Used battery</td><td>A102d</td><td>0.025</td><td>KLHK-1689809264</td></tr> <tr> <td>Electronic waste</td><td>B107d</td><td>0.0055</td><td>KLHK-1689808217</td></tr> <tr> <td>Used oil</td><td>B105d</td><td>0.8415</td><td>KLHK-1689924483</td></tr> </table> <p>The company has Hazardous Waste Storage (TPS Limbah B3) located in the KAE Head Office area and in the UAI Mill area, referring to the Rincian Teknis Penyimpanan Limbah Bahan Berbahaya dan Beracun (Limbah B3) PT Usaha Agro Indonesia, No. P/2614/PERKIMLH-D.660.1/XI/2021, dated 23 Nov 2021. In the Rincian Teknis it is stated that:</p> <ul style="list-style-type: none"> Point 5. hazardous waste storage activities are carried out after obtaining environmental approval. Appendix Section D.5. Hazardous Waste packaging must have Hazardous Waste symbols and labels attached in accordance with the provisions of legislation on packaging and/or other containers in accordance with the characteristics of Hazardous Waste. <p>During the field visit:</p> <ul style="list-style-type: none"> At the Hazardous Waste Storage in KAE and Mill, it was found that temporary storage activities for hazardous waste were still being carried out even though there was no environmental approval, and symbols for hazardous waste were found that were not in accordance with the provisions of statutory regulations. At the MAE Clinic, medical waste was found that was not sent to the Hazardous Waste Storage. The last delivery of medical waste by MAE will be in December 2023. <p><i>Minor Non-conformity:</i></p>	Used rags	B110d	0.1044	KLHK-1689806337	Used rags	B110d	0.016	KLHK-1689806607	Used battery	A102d	0.025	KLHK-1689809264	Electronic waste	B107d	0.0055	KLHK-1689808217	Used oil	B105d	0.8415	KLHK-1689924483	
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		The company cannot show evidence that hazardous waste management is in accordance with applicable regulations.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Based on field visit to the housing compound and landfill at Block N15, KAE, domestic waste disposal is in accordance with waste management and the prohibition of burning policies. Every worker understands that domestic waste must be sorted and disposed into separate organic and inorganic waste bins, then disposed into the landfill by appointed officials.	Complied
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Based on field visit during this ASA 1_1, there is no use of open fire for waste disposal. Inorganic waste, particularly plastic waste, is disposed of in a landfill. Landfill visited are situated in Block N15 Keruing Agro Estate. Organic and inorganic waste are separated by a different hole. Workers interviewed are aware that open fire for waste disposal are prohibited.	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. - Minor compliance -	The Unit of Certification has best practices mechanism in maintain and improve long term soil fertility, set in Fertilizer Recommendation PT Usaha Agro Indonesia 2023/2024 – FQA, Agronomy, and Continuous Improvement Report, which produced on annual basis for all estates. The recommendation is developed based on the following factors: <ul style="list-style-type: none"> • Area statement • Rainfall data (2014 – 2022/2023) • FFB production data (2016 – 2022/2023) • Leaf sampling (Annual basis) • Planning and realisation of manuring 2022/2023, • Fertilizer Recommendation 2022/2023, and • Field visit 	Complied

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		<p>Latest Fertilizer Recommendation 2024 for all estates were made available during the audit. Record of fertilizer recommendation according to "Memorandum Nomor 001/GM-UAI&APIn/I/2024" dated 3 January 2024</p> <p>This document set a sort of strategy to maintain and improve long term fertility, by combining efficient and measurable in-organic fertilization, take into account the oil palm age and soil nutrient properties by conducting leaf and soil sampling, as well as fertilization best practices on the field.</p> <p>Based on field observation of fertilization activity during this audit ASA1.1, the applicators have used calibrated cup as a spreading tool. The fertilizer was spread on the edge of the circle according to the SOP. Based on interview, the chemical fertilizer is not implemented on riparian.</p>	
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> <p>- Minor compliance -</p>	<p>The most recent soil analysis as a reference for manuring recommendation conducted on 21 April – 17 May 2021 for Keruing Agro Estate, Meranti Agro Estate and Ulin Agro Estate. Report of Analysis are available in document: Report of Analysis ROA number 040/SL/2021 (Keruing Agro Estate), 041/SL/2021 (Ulin Agro Estate) 042/SL/2021 (Meranti Agro Estate). Elements analyzed are pH H₂O, Total-N, Total Organic Carbon, Texture, C.E.C, Exch. K, Exch. Mg, Exch. Ca, Exch. Na, Available P-Bray-II, P₂O₅ in 25% HCl, FE in DTPA, Al-dd and Boron in Hot Water. Soil analysis conducted by PT Binasawit Makmur – Sampoerna Agro Tbk. Soil analysis conducted each 5 year.</p> <p>Another soil analysis was carried out on January 2023, in the land application area.</p> <p>The latest leaf sampling was conducted on 17 April 2023 for Meranti Agro Estate, 2 May 2023 for Ulin Agro Estate and 12 June 2023 for Keruing Agro Estate. Leaf sampling analysis conducted by PT Binasawit</p>	Complied

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		<p>Makmur – Sampoerna Agro Tbk. Sampling analysis result has shown the average level of element N, P, K, Ca, Mg, and B was at optimum level. Report of Analysis were available:</p> <ul style="list-style-type: none"> - "Laporan Hasil Uji" Report of Analysis ROA number 070/FL/2023 dated 22 May 2023 – Meranti Agro Estate - "Laporan Hasil Uji" Report of Analysis ROA number 079/FL/2023 dated 2nd June 2023 – Ulin Agro Estate - "Laporan Hasil Uji" Report of Analysis ROA number 104/FL/2023 dated 10th July 2023 – Keruing Agro Estate <p>The result was tabulated in a table entitled "<i>Data Analisa Daun 2023</i>". In addition, the Fertilizer Recommendation 2023 report, encompassing all estates, was thoughtfully prepared by PT UAI's Field Quality Assurance (FQA). This report reflects the unit's commitment to ensuring optimal soil fertility and productivity.</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>As highlighted in the Annual Fertilizer Recommendation Report, the application of EFB (Empty Fruit Bunch) mulching is advised, particularly for mineral soils. Organic fertilizer recommendation 2024 according to "Memorandum Nomor 001/GM-UAI&Pain/I/2024" dated 3 January 2024. According to recommendation, organic fertilizer (mulching) EFB application dosage 2024 is 40 ton/ha for Ulin Agro Estate, Keruing Agro Estate and Meranti Agro Estate. While in 2023 EFB application dosage was 37.26 ton/ha for Ulin Agro Estate, 32.57 ton/ha for Keruing Agro Estate and 30.00 ton/ha for Meranti Agro Estate.</p> <p>To ensure transparency and compliance, records of EFB application for all estates within the certification unit are maintained in the EFB Application Monitoring system, also referred to as "<i>Monitoring Aplikasi Janjang Kosong</i>."</p> <p>Total application of EFB in 2023:</p>	Complied

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		<ul style="list-style-type: none"> - Ulin Agro Estate: 6.546 ton; area application 175.68 ha - Keruing Agro Estate: 17,864 ton; area application 548.43 ha - Meranti Agro Estate: 998 ton; area application 33.27 ha <p>Total application of EFB in 2024 (ytd Feb 2024):</p> <ul style="list-style-type: none"> - Ulin Agro Estate: 513.60 ton - Keruing Agro Estate: 1,783.20 ton - Meranti Agro Estate: 40.66 ton <p>PT UAI also use POME application as organic fertilizer in mineral soil. They utilize 100% of the effluent generated for land application purposes, specifically to field P0024.</p> <p>Furthermore, the practice of recycling biomass has been actively implemented, with a focus on utilizing the fiber and shell components in the boiler. This approach aligns with sustainable practices for waste reduction and energy utilization. Additionally, the treatment of Palm Oil Mill Effluent (POME) is carried out through the application of a Methane capture approach, contributing to environmental sustainability.</p> <p>The implementation of EFB application was thoroughly reviewed by the company, and the outcomes were documented. This review process confirmed that all programs were implemented in accordance with the recommendations outlined in the "<i>Rekomendasi Pupuk Organik</i>".</p>	
7.4.4	Records of fertilizer inputs are maintained. - Minor compliance -	<p>The result of leaf sampling analysis, soil sampling analysis along with visual analysis, planting material, planting age and rain fall are considered in proposing the Fertilizer Recommendation.</p> <p>The fertilizer application program within the unit of certification is documented in the Manuring Program/Block, ensuring approach to nutrient management. Subsequently, the actual implementation of these</p>	Complied

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		<p>programs is recorded in the Foreman Logbook (<i>Buku Kerja Mandor</i>), which is then integrated into the "<i>Monitoring Aplikasi Pemupukan</i>" system. This monitoring document serves as a comprehensive information, including:</p> <ul style="list-style-type: none"> • The specific estate (Kebun) • The corresponding period (Periode) • The type of fertilizer used (Jenis pupuk) • The month of application and the respective dosage • A comparative summary of the recommended dosage versus the actual implementation. <p>During verification process, it was confirmed that the data recorded in both documents, the Manuring Program/Block and the Foreman Logbook, were synchronized and accurate. Occasionally, adjustments to the dates of manuring activities were necessitated by unforeseen weather conditions, which were beyond the control of the estates.</p> <p>Below are the recap of fertilizer application realization for year 2023 of PT UAI:</p> <table> <tr> <th rowspan="2">Fertilizer Type</th><th colspan="3">Fertilizer Application (kg)</th></tr> <tr> <th>Keruing Agro Estate</th><th>Meranti Agro Estate</th><th>Ulin Agro Estate</th></tr> <tr> <td>Urea</td><td>8,180</td><td>220,901</td><td>0</td></tr> <tr> <td>Rock Phospate</td><td>0</td><td>233,910</td><td>0</td></tr> <tr> <td>MOP</td><td>0</td><td>466,300</td><td>0</td></tr> <tr> <td>Dolomite</td><td>17,450</td><td>132,300</td><td>5,550</td></tr> <tr> <td>Borate</td><td>11,305</td><td>33,150</td><td>9,800</td></tr> <tr> <td>CuSO4</td><td>0</td><td>0</td><td>0</td></tr> </table>	Fertilizer Type	Fertilizer Application (kg)			Keruing Agro Estate	Meranti Agro Estate	Ulin Agro Estate	Urea	8,180	220,901	0	Rock Phospate	0	233,910	0	MOP	0	466,300	0	Dolomite	17,450	132,300	5,550	Borate	11,305	33,150	9,800	CuSO4	0	0	0	
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Criteria 7.5: Practices minimise and control erosion and degradation of soils.																			
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available. - Critical (Major) compliance -	Detailed soil maps providing insights into the unit of certification's soil composition can be accessed through the "Detailed Soil Map (<i>Peta Tanah Detil PT Usaha Agro Indonesia</i>)" and the "Details of Survey and Mapping 2016 (<i>Survei dan Pemetaan Tanah Details 2016</i>)", thoughtfully compiled by the Field Quality Assurance team. A specific focus is placed on identifying fragile soils, particularly of the peat and sandy types. Notable examples of soil series identified within these fragile soil categories include: <ul style="list-style-type: none">• <i>Typic Haplohemists</i>• <i>Typic Haplosaprists</i>• <i>Typic Haplofibrist</i>	Complied																

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		<p>Topography or slope refer Section 2.3: "<i>Elevasi, Kemiringan Lahan, dan Bentang Lahar</i>" in the "<i>Survei dan Pemetaan Tanah Details 2016</i>" for all estates. This section confirms that the estates are predominantly situated on flat to undulating terrain.</p> <p>Field observation conducted during this ASA 1_1 to further ensure compliance with best management practices across both peat and sandy areas within the unit of certification. In areas prone to potential flooding, such as peat soils, the unit has proactively constructed bunds to mitigate the risk of overflow from higher water level areas. In sandy regions, a proactive approach is adopted, where the certification unit maintains grasses and ferns and also application of EFB. This practice serves to uphold soil moisture levels and stabilize soil structure, thereby promoting sustainable land management and ecosystem preservation.</p>	
7.5.2	<p>The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Referring to indicator 7.5.1, it is noted that the unit of certification is situated on terrain characterized by a predominantly flat to undulating topography. The gradient of this terrain falls within the range of 0% to 8% across all estates.</p> <p>No replanting of palm oil conducted on steep terrain.</p>	Complied
7.5.3	<p>New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Referring to indicator 7.5.1, it is noted that the unit of certification is situated on terrain characterized by a predominantly flat to undulating topography. The gradient of this terrain falls within the range of 0% to 8% across all estates.</p> <p>No new planting of palm oil conducted on steep terrain.</p>	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	<p>(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.</p>	<p>Unit of certification has demonstrated evidence of long-term land suitability for oil palm cultivation. Maps displaying the soil types within the unit of certification are readily accessible within the Detailed Soil Map (<i>Peta Tanah Detil PT Usaha Agro Indonesia</i>) and the Details of</p>	Complied

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	- Critical (Major) compliance -	<p>Survey and Mapping 2016 (<i>Survei dan Pemetaan Tanah Details 2016</i>), both issued by the Field Quality Assurance team. These maps have been updated in 2020 by the Geo-Information Planning, GIS, and Survey Sustainability Department.</p> <p>The plantations are situated upon terrain that encompasses both flat and undulating landscapes. Within the certification unit, there have been discernible identifications of fragile soils, primarily consisting of peat and sandy types. A few notable examples of soil series representing these fragile soils within the certification unit include:</p> <ul style="list-style-type: none"> - <i>Typic Haplohemists</i> - <i>Typic Haplosaprists</i> - <i>Typic Haplofibrist</i> <p>These provide an understanding of the unique soil characteristics present in the certification unit, important for sustainable land management practices.</p>	
7.6.2	<p>Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.</p> <p>- Minor compliance -</p>	<p>Based on field observations during ASA 1_1, it is noted that the planted areas on peatland are being managed in accordance with best practices for peatland cultivation. The drainage system is being maintained, ensuring that water levels are consistently monitored and maintained at appropriate levels, typically within the range of 50-70 centimetres from the surface. Additionally, the ground cover within these areas is observed to be in a satisfactory condition.</p> <p>The procedures regulated water management are outlined in the document titled "<i>Tata Kelola Air di Area Rendahan</i>" (Water Management System at Peatland dan Lowland) P-SAG-KBN-PML-28 dated 01 Jul 2020. This document has been thoroughly reviewed and serves as the guiding framework for effective water management within both peatland and lowland areas. These practices align with responsible and sustainable</p>	Complied

		land management principles, ensuring the preservation of peatland ecosystems while enabling productive agricultural activities.	
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Unit of certification has demonstrated report of soil survey and topographic information that guide the planning of drainage system, road, bridge, building and other infrastructure. Maps displaying the soil types within the unit of certification are readily accessible within the Detailed Soil Map (<i>Peta Tanah Detil PT Usaha Agro Indonesia</i>) and the Details of Survey and Mapping 2016 (<i>Survei dan Pemetaan Tanah Details 2016</i>), both issued by the Field Quality Assurance team. These maps have been updated in 2020 by the Geo-Information Planning, GIS, and Survey Sustainability Department.</p> <p>The plantations are situated upon terrain that encompasses both flat and undulating landscapes. Within the certification unit, there have been discernible identifications of fragile soils, primarily consisting of peat and sandy types. A few notable examples of soil series representing these fragile soils within the certification unit include:</p> <ul style="list-style-type: none"> - <i>Typic Haplohemists</i> - <i>Typic Haplosaprists</i> - <i>Typic Haplofibrists</i>. <p>Soil erosion surveys have been included in AMDAL, as indicated in Section 3.1.5(3) and the Environmental Impact Analysis and Environmental Management Plan. It is noted that the AMDAL has stated that the possibility of erosion within the plantation area is very small. However, it is acknowledged that this situation could change if heavy rain continues to occur in the area.</p> <p>Based on field observations during ASA 1_1, it is noted that the planted areas on peatland are being managed in accordance with best practices for peatland cultivation. The drainage system is being maintained,</p>	Complied

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		ensuring that water levels are consistently monitored and maintained at appropriate levels, typically within the range of 50-70 centimetres from the surface. Additionally, the ground cover within these areas is observed to be in a satisfactory condition.	
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -	<p>The unit of certification has comprehensive maps that provide valuable information about the soil composition and suitability of the area:</p> <ol style="list-style-type: none"> 1. Detailed Maps: These maps display the locations of mineral, sandy, and peat soils. These details are crucial for land management and planning. 2. HCV Maps: These maps include information on the depth of peat soils. The certification unit has conducted soil study surveys using HCV maps, leading to the creation of a Soils Suitability Map. This map helps in determining which areas are suitable for specific land uses based on soil characteristics. <p>Furthermore, the certification unit has undertaken Environmental Impact Assessments (EIA) as part of its responsible land management practices:</p> <ol style="list-style-type: none"> 1. "Analisis Mengenai Dampak Lingkungan Hidup (AMDAL)": This assessment, referenced as Ref. No.: 29, 2009, dated 16 January 2009, is a tool for evaluating and mitigating environmental impacts. It ensures that sensitive and fragile soils, such as peat, are considered in land-use planning. 2. "Analisis Dampak Lingkungan Hidup dan Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan" (ANDAL Dan RKL – RPL): This assessment, referenced as No.: 208/DPMPTSP-D.B/2018, dated 22 June 2018, provides insights into the environmental impacts of land management practices and outlines 	Complied

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		<p>plans for environmental monitoring. The assessment confirms that peatlands and other sensitive areas have been taken into account.</p> <p>Field observation conducted to the operational area of PT UAI during this ASA 1_1, confirmed that no extensive planting has occurred in fragile areas. New planting on peatlands has not taken place since 2017.</p>	
7.7.2	<p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p> <p>- Minor compliance -</p>	<p>There is no change of peat inventory and reporting compared to the previous assessment. The unit of certification has taken comprehensive steps to address peat inventory and environmental considerations in its certified area:</p> <ol style="list-style-type: none"> 1. Previous Certified Area (8,287 ha): A peat inventory for Sampoerna Agro Tbk was submitted to RSPO, as documented in email communication sent on 14 November 2019. This inventory provides essential information about peatlands within the certified area, contributing to responsible land management practices. 2. HCV Assessment: The Public Summary of High Conservation Value, Full Assessment Report for PT Usaha Agro Indonesia, dated 20 June 2016, in Section 5.4: Physical Environment Context, reported the presence of peat soils (<i>haplosaprist</i> and <i>haplohemist</i>) in the scope extension area. This recognition of peatlands highlights the importance of considering ecological significance in land-use planning and management. 3. Scope Extension during ASA 2: PT UAI continued its commitment to responsible land management by submitting email communication to the GHG Unit of RSPO, dated 27 July 2021. This communication included information such as soil maps and the RSPO Peat Inventory Template – SGRO for the scope extension area. These details are important for assessing and managing peatland resources within the extension area. 	Complied

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		Overall, PT Usaha Agro Indonesia has demonstrated dedication to environmentally responsible practices by actively addressing peat inventory and environmental considerations in its certified areas, aligning with RSPO guidelines and sustainability principles. Peat area within unit of certification has been managed, inventoried, documented and reported to the RSPO Secretariat The 2 nd submission of Peat Inventory has been submitted to the RSPO Secretariat on 27 October 2023.	
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	<p>The unit of certification has taken proactive steps to monitor and address peat subsidence, soil conditions, and fire risk in its estates:</p> <ol style="list-style-type: none"> 1. Peat Subsidence Monitoring: Peat subsidence monitoring is in place, and peat subsidence poles have been installed for this purpose. Based on the <i>"Peta Realisasi Pemasangan Peat Subsidence KAE in February 2022"</i> and <i>"Peta Realisasi Pemasangan Peat Subsidence UAE in February 2022"</i>, a total of 17 poles (8 at KAE and 9 at UAE) have been installed. The monitoring records are maintained and can be found in the <i>"Rekap Monitoring Peat Subsidence UAE & KAE"</i> with the latest data recorded in February 2024. Field visit conducted to peat subsidence monitoring pole at Block O22 KAE, the pole is in good condition. 2. Water Level Monitoring: Site observations during the audit confirmed that the water levels were satisfactory. These water level measurements are recorded in the <i>"Rekap Monitoring Piezometer Kebun (UAE and KAE)"</i> for the period from 2021 to February 2024. Field visit conducted to Piezometer at Block O22 KAE, the piezometer is in good condition. The scale shows -73 cm. 	Complied

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		<p>3. Detailed Soil Surveys: The <i>"Survei dan Pemetaan Tanah Detail"</i> conducted in 2016 for all estates provides information on soil types within the estates. It is confirmed that PT UAI primarily has peat soil, mainly at KAE and UAE.</p> <p>4. Fire Risk Assessment: The <i>"Peta Lokasi Rawan Kebakaran"</i> is a spatial map that identifies areas with a high risk of fire within the estates. Notably, there is a significant high-risk area for fire located in the northern part of UAE. This map is essential for fire prevention and management efforts.</p> <p>5. Latest Peat Subsidence Map: The latest <i>"Peta Realisasi Pemasangan Peat Subsidence UAE"</i> (Reference: 026/GIS-SUS/HO/II/2021) further supports peat subsidence monitoring efforts. The estate representative provided explanations about this map, and it was documented in the monthly planning (Rencana Kerja Bulanan – May 2023).</p> <p>These initiatives reflect PT Usaha Agro Indonesia's commitment to responsible land management and environmental stewardship by actively monitoring and addressing peatland conditions, subsidence, water levels, soil types, and fire risk in its estates.</p>	
7.7.4	<p>(C) Availability of implementation evidence of the water and land cover management program.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia (UAI) has made progress in water management for peat areas and maintains comprehensive plans for its ongoing water management efforts:</p> <p>1. Construction of Bunds and Weirs: Progress notes up to February 2024 indicate that PT UAI has been actively constructing bunds and weirs for flood control and water level management in appropriate areas. These structures are essential for maintaining optimal water levels in peat areas.</p> <p>2. Detailed Water Management Program: The "Program Water Management PT UAI 2024" specifically outlines the company's water</p>	Complied

		<p>management plans for Ulin Agro Estate and Kruing Agro Estate. It includes tasks, specifications, programs, timelines (planned and actual), and progress remarks. This comprehensive document covers various aspects of water management, such as drainage cleaning, canal weirs, flap gates, retention basins, and infrastructure monitoring (water level, piezometer & piezometer).</p> <p>3. Water Level Monitoring: Site observations during ASA 1_1 confirmed that water levels in peat areas were satisfactory. PT UAI actively monitors groundwater and surface water levels in peat areas using piezometers, with records maintained on a weekly basis. These records were made available during the audit, as evidenced in the <i>"Rekap Monitoring Piezometer Kebun (Ulin Agro Estate & Kruing Agro Estate)"</i> for the period 2023 and 2024.</p> <p>4. Land Cover Maintenance: PT UAI places importance on maintaining land cover to preserve soil fertility and minimize environmental impacts. The observed maintenance of land cover during the site visit reflects the company's commitment to responsible land management practices.</p> <p>5. Effective Water Management Implementation: Site observations in various blocks of UAE, KAE, MAE, Kopbun Jambi Mekar Jaya Sempurna and Kopbun Sempurna Mandiri confirm that water management has been properly implemented. Implementation documentation for all estates were presented during the audit.</p> <p>Progress of Water Management 2023, such as cleaning and making ditches (main drain, collection drain, field drain), Jambi River normalisation, embankment maintenance, making water point, etc.</p> <p>Overall, PT Usaha Agro Indonesia's approach to water management and the maintenance of land cover in peat areas demonstrates its commitment to responsible land management practices and</p>	
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		environmental management. The company's planning and monitoring efforts align with sustainability principles and are important for the long-term sustainability of its operations.	
7.7.5	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the information gathered from interviews with the company's representative and site observations, it has been confirmed that no replanting activities have been conducted yet. The oldest oil palms planted in 2006, therefore the earliest replanting will be carried out in 2026.</p> <p>The unit of certification is willing to implement RSPO Drainability Assessment Procedure, November 2019. Based on the document, RSPO requires a Drainability Assessment to be undertaken starting approximately 5 years before replanting the oil palm on peat (refer to Annex 5). However, the company has collect data of subsidence and water level trends, as evidence in as follow:</p> <ol style="list-style-type: none"> 1. Peat Subsidence Monitoring: Peat subsidence monitoring is in place, and peat subsidence poles have been installed for this purpose. Based on the <i>"Peta Realisasi Pemasangan Peat Subsidence KAE in February 2022"</i> and <i>"Peta Realisasi Pemasangan Peat Subsidence UAE in February 2022"</i>, a total of 17 poles (8 at KAE and 9 at UAE) have been installed. The monitoring records are maintained and can be found in the <i>"Rekap Monitoring Peat Subsidence UAE & KAE"</i> with the latest data recorded in February 2024. Field visit conducted to peat subsidence monitoring pole at Blok O22, the pole is in good condition. 2. Water Level Monitoring: Site observations during the audit confirmed that the water levels were satisfactory. These water level measurements are recorded in the <i>"Rekap Monitoring Piezometer Kebun (UAE and KAE)"</i> for the period from 2021 to February 2024. 3. Field visit conducted to Piezometer at Block O22 KAE, the piezometer is in good condition. The scale shows -73 cm. 	Complied

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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	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Water Management System (P-SAG-KBN-PML-28) dated 1 Jul 2020, the procedure have been referring to RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019).</p> <p>Principles of Water Management:</p> <ul style="list-style-type: none"> • Does not hold water but flows water. The canal is dug straight, the excavated soil is disposed in one direction. • Water from outside the estate (inlet) must not enter the area. • If there is an inlet it is managed directly to the boundary or directed to the outlet. • The river functions as a place for water disposal. • The area is divided into 2 catchment area zones, namely macro between estates and micro within estates. • Each catchment area has its own outlet. • The block design for water management is based on the location and flow of the river. • The main drain is parallel to the river flow, while the collection drain is perpendicular to the river flow. • The water flow in the block is turned off to be channelled into a canal which was created for easy control and high productivity of the heavy equipment. 	Complied
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		<ul style="list-style-type: none">• Optional fast field drain as required.• No flooding in the rainy season and drought in the dry season. <p>Water Management Plan PT UAI, dated 2 Feb 2024:</p> <ul style="list-style-type: none">• Marking of clean water source's locations.• Awareness not to throw rubbish at water source locations.• Regular testing of clean water quality according to regulations• Marking of agrochemical application limits• Construction/maintenance of canals and water embankments• Construction/maintenance of water gates• Installation and monitoring of water levels.• Installation and monitoring of piezometers at planting areas in accordance with regulations or recommendations from the Water Management Division. <p>In accordance with the Peat Audit Guidance, the status of water level monitoring implementation is considered satisfactory. The necessary prerequisites have been met, including:</p> <ul style="list-style-type: none">• The installation of water level monitoring posts at strategically chosen locations.• The deployment of piezometers for accurate measurement.• Regular weekly monitoring of water levels, with meticulous record-keeping.• Integration of water level data into the comprehensive water management plan.	
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		<p>Peat subsidence monitoring is in place, and peat subsidence poles have been installed for this purpose. Based on the <i>"Peta Realisasi Pemasangan Peat Subsidence KAE in February 2022"</i> and <i>"Peta Realisasi Pemasangan Peat Subsidence UAE in February 2022"</i>, a total of 17 poles (8 at KAE and 9 at UAE) have been installed. The monitoring records are maintained and can be found in the <i>"Rekap Monitoring Peat Subsidence UAE & KAE"</i> with the latest data recorded in February 2024. Field visit conducted to peat subsidence monitoring pole at Blok O22, the pole is in good condition.</p> <p>Site observations during the audit confirmed that the water levels were satisfactory. These water level measurements are recorded in the <i>"Rekap Monitoring Piezometer Kebun (UAE and KAE)"</i> for the period from 2021 to February 2024. Field visit conducted to Piezometer at Block O22 KAE, the piezometer is in good condition. The scale shows -73 cm.</p> <p>Regarding fire prevention and control measures, proactive steps have been taken to ensure the safety and security of the area. These actions encompass:</p> <ul style="list-style-type: none"> • Continuous water level monitoring to detect any potential fire risks. • Prominent signage displaying the warning message <i>"Stop Kebakaran!!"</i> placed strategically throughout relevant areas. • The installation of fire monitoring towers at key locations, such as KAE – Block I/N 12 and MAE – Block C34. <p>It is noted that there have been no instances of fire evidence resulting from waste disposal practices, and the presence of leaning palm trees has been observed as a rare occurrence, signifying a commendable level of environmental preservation.</p> <p>The unit of certification has established a procedure titled <i>"Pengendalian Kebakaran Lahan dan Perkebunan"</i> (No. P-SAG-KBN-DRR-02), dated 1 December 2020. This document outlines the protocol, along with associated responsibilities, concerning fire prevention and control. The</p>	
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		<p>development and execution of this procedure have been undertaken, among other reasons, to ensure compliance with local legal requirements, such as Ministry of Agriculture Regulation "Permentan No. 5 Tahun 2018" regarding Land Clearing and/or Cultivation.</p> <p>To oversee and respond to fire incidents on peat soils, unit of certification has established a dedicated team known as "SatGas" and "Kelompok Tani Peduli Api (KTPA)". There has been reported a fire incident as recorded on "Laporan Kebakaran Lahan Perkebunan", No. 003/LKLP/KAE/X/23, dated 7 Oct 2023 for fire incidents at borders of Block IQ0031, IQ0032 and IR0028 Division 4 KAE on 4-7 Oct 2023. Report completed with incident chronology, action taken, location of incident, pictures and map. The condition of fire has been controlled on 7 Oct 2023 at 11.00 PM. Based on record reviews, interviews with management personnel, and on-site assessments, it is evident that the unit of certification has implemented well-planned and effective measures to proactively manage and control potential fire events.</p> <p>The on-site observations have further confirmed the implementation of these measures across all estate locations. This includes the installation of pertinent warning signs, strategically positioned fire towers, and the establishment of water level monitoring systems, ensuring a holistic approach to fire prevention and control.</p>	
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the findings, it is evident that the management of areas planted on peat soils has adhered to best practices for peatland cultivation. This conclusion is substantiated through site observations and interviews conducted during the assessment process.</p> <p>Unplanted peat areas are protected, there is no construction of drainage channels, building roads and new electricity lines on those peatlands.</p>	Complied

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Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <ul style="list-style-type: none"> - Minor compliance - <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>The unit of certification has developed a comprehensive Water Management Plan (FM-SAG-ADM-KTU-080001), which encompasses several key aspects:</p> <ol style="list-style-type: none"> 1. Identification of Water Sources: The plan identifies various water sources, including bore wells, water catchments, rivers, and rainwater. 2. Management of Water Sources: It outlines measures for maintaining buffer zones, routine maintenance of water drainage in peat areas, and the maintenance of water levels. 3. Monitoring of Water Sources: The plan includes provisions for analysing the quality of drinking water and domestic water, as well as installing signage to prevent chemical application. 4. Water Quality Monitoring: The certification unit has established a Procedure for Water Management Plan at Low-lying Area (P-SAG-KBN-PML-28) to address water management in peat areas. <p>Additionally, the "Program Water Management PT Usaha Agro Indonesia" (Doc. No.: FM-SAG-ADM-KTU-080001; Rev. 0) dated 2 February 2024, specifies the company's water management plan for three specified areas: housing and office areas, palm oil mill areas, and plantation areas. The plan includes details such as water sources, management responsibilities, monitored parameters, monitoring locations, and frequencies. Notably, actions outlined in the plan, such as water quality monitoring for wells, are implemented as scheduled.</p> <p>Surface water monitoring, conducted on 10 July 2023, by independent Laboratory PT Graha Mutu Persada, adheres to Government Regulation No. 22/2021. Site observations confirm that the 50-meter buffer zones along watercourses are well-maintained. Notably, there is no evidence</p>	Complied

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		<p>of chemical application within the riparian areas. Interviews with spraying applicators have verified that no herbicide or manuring activities are permitted in these environmentally sensitive zones.</p> <p>The clean water monitoring conducted by PERKIMLH Office Ketapang Laboratory for all units (KAE, MAE, UAE, POM, Staff) successfully measured various parameters such as turbidity, pH, Pb, Cd, Fe, Mn, Zn, NO2, and F, ensuring the quality and safety of the water supply.</p>	
	7.8.1b Workers have adequate access to clean water.	<p>The water management plan places a strong emphasis on ensuring that local communities, workers, and their families have access to clean and adequate water for various purposes. To contribute to the well-being of these communities, river water quality is monitored every six months, with the latest monitoring conducted in December 2023 by independent Laboratory PT Graha Mutu Persada, in compliance with Government Regulation No. 22/2021.</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>- Critical (Major) compliance -</p>	<p>The unit of certification has established a map that pinpoints the locations of identified natural watercourses and wetlands throughout the area. This map is incorporated into the High Conservation Value (HCV) Map dated March 2016.</p> <p>In a dedicated effort to preserve these natural features, the certification unit maintains the riparian and buffer zones in accordance with the guidelines outlined in Section 6.3.1: HCV Management Plan.</p> <p>Field verification during ASA 1_1 conducted to confirm the implementation of the management plan as recommended by the HCV assessor. The site inspections focused on wetlands located in deep peat areas (HCV1, 3&4) within KAE Blocks IO0022, IN0018 and IN0019, as well as riparian zones. The outcomes of these inspections demonstrate the certification unit's commitment to maintaining riparian and buffer zones that serve to safeguard watercourses. During a site visit to Riparian of Danau Kapar River, the audit team found the buffer zone to</p>	Complied

		be well-maintained, further demonstrates the certification unit's dedication to preserving these vital ecosystems.													
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>The mill's effluent treatment process is well-documented in the procedure of Final Effluent Treatment (P-SAG-PKS-PRS-11). This procedure outlines the flow of the effluent treatment process, ensuring transparency and clarity in its execution. To provide visual guidance and awareness, a map indicating the precise location of the effluent treatment plant is displayed in the meeting room.</p> <p>The quality of the final water discharge, particularly for land application, undergoes sampling and monitoring. This oversight is in place to guarantee that the discharged water complies with the legal requirements specified in the Implementation Permit issued, known as "Izin Land Aplikasi PT UAI Seluas 163.66 Ha". This permit, authorized by the Regent of Ketapang Decree No. 400/PERKIMLH-C/2017. According to this permit, the approved threshold for discharged BOD (Biological Oxygen Demand) is set at <5,000 mg/litre.</p> <p>The permit is valid for 5 years, so it expires on 24 July 2022. However, there is a letter from the Head of the Public Housing Service for Settlement Areas and the Environment (Dinas Perumahan Rakyat Kawasan Permukiman dan Lingkungan Hidup) No. B/0963/PERKIMLH-E.660.1/VI/2022, dated 17 June 2022, concerning Land Application Directions, states that "PT UAI's Waste Water Utilization Permit does not need to be extended and is declared to remain valid as long as it meets the provisions as stated in Attachment I to the Decree Ketapang Regent No. 400/PERKIMLH-C/2017.</p> <p>Based on the Attachment to Ketapang Regent's Decree No. 400/PERKIMLH-C/2017, dated 25 July 2017, the application block consists of 29 blocks, namely:</p> <table><tr><th>No.</th><th>Block</th><th>Application Area (Ha)</th></tr><tr><td>1</td><td>NA17A</td><td>8.90</td></tr></table> <table><tr><th>No.</th><th>Block</th><th>Application Area (Ha)</th></tr><tr><td>16</td><td>P021</td><td>2.03</td></tr></table>	No.	Block	Application Area (Ha)	1	NA17A	8.90	No.	Block	Application Area (Ha)	16	P021	2.03	Non-compliance
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		2	O021A	6.10		17	N014A	5.87																					
		3	O018	4.10		18	O015A	0.38																					
		4	P019A	9.79		19	N014B	2.16																					
		5	O017	3.67		20	O016B	1.71																					
		6	N016A	8.51		21	N014C	2.51																					
		7	O014	14.56		22	P019B	3.20																					
		8	N015A	9.02		23	P018B	4.94																					
		9	O013	4.82		24	O021B	2.61																					
		10	O019	12.80		25	N016B	13.37																					
		11	O016A	1.72		26	O015C	2.82																					
		12	O020	17.13		27	N016	0.50																					
		13	P018A	5.58		28	O20	0.51																					
		14	P020	2.60		29	N016B	8.00																					
		15	O015A	11.75		Total		163.66																					
		Area of study and control:																											
		<table><tr><th>No.</th><th>Block</th><th>Application Area (Ha)</th></tr><tr><td>1</td><td>N014A</td><td>5.87</td></tr><tr><td>2</td><td>N015A</td><td>9.02</td></tr><tr><td>3</td><td>N016A</td><td>8.51</td></tr><tr><td>4</td><td>NA17A</td><td>8.90</td></tr><tr><td>5</td><td>N016B</td><td>8.00</td></tr></table>								No.	Block	Application Area (Ha)	1	N014A	5.87	2	N015A	9.02	3	N016A	8.51	4	NA17A	8.90	5	N016B	8.00		
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		Part III of attachment regarding Prohibition. Point c, the initiator is prohibited from disposing of POME on land outside the designated area.																											
During field visit, Land Application was carried out on Block N015A which was equipped with a monitoring well to analyze POME, especially BOD, on a regular basis. However, in other locations it was found that POME was applied by pouring it on oil palm circles that had been given EFB																													

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		<p>and mineral soil, in blocks that were not included in the Land Application permit, which is Block N052 UAE.</p> <p>To ensure compliance, samples of discharged wastewater are collected on a monthly basis. These samples are then analysed by independent Laboratory, PT Mutu Agung Lestari. An example of the analysis results for the months of January to December 2023 has been reviewed and confirms compliance with the prescribed limits established by the relevant regulation. It is notable that for January to December 2023, the BOD levels were reported within acceptable standards (<5,000 mg/L).</p> <table><tr><th>Month</th><th>BOD₅ (mg/L)</th></tr><tr><td>January</td><td>4051</td></tr><tr><td>February</td><td>1273</td></tr><tr><td>March</td><td>1867</td></tr><tr><td>April</td><td>3030</td></tr><tr><td>May</td><td>2575</td></tr><tr><td>June</td><td>3911</td></tr><tr><td>July</td><td>2816</td></tr><tr><td>August</td><td>3620</td></tr><tr><td>September</td><td>2536</td></tr><tr><td>October</td><td>3637</td></tr><tr><td>November</td><td>3152</td></tr><tr><td>December</td><td>2936</td></tr></table> <p>Minor Non-conformity:</p> <p>The unit of certification cannot demonstrate sufficient evidence that the Palm Oil Mill Effluent (POME) application has been carried out in accordance with applicable regulations.</p>	Month	BOD ₅ (mg/L)	January	4051	February	1273	March	1867	April	3030	May	2575	June	3911	July	2816	August	3620	September	2536	October	3637	November	3152	December	2936	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>The water consumption at UAI Palm Oil Mill (POM) is tracked and documented in the "Data Pengambilan dan Pemakaian Air Permukaan</p>	Complied																										

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	<p>- Minor compliance -</p>	<p><i>Tahun 2023"</i> (Surface Water Intake and Usage Data for the Year 2023). This table provides a comprehensive overview of water usage, including the following details for each month:</p> <ul style="list-style-type: none"> - Month - Fresh Fruit Bunches (FFB) processed - Water usage (m³) – categorized into process, boiler, others, and the total m³ used - Water consumption per tonne FFB (M³/ton) <p>The recorded data is updated on a monthly basis, and these records undergo a thorough verification process, acknowledge by the mill manager. As a result of this monitoring, the average water usage for the period January to December 2023 was consistently maintained at 1.25 m³ per tonne of FFB processed, underscoring the mill's commitment to responsible water management practices.</p> <table border="1"> <thead> <tr> <th>Month</th><th>FFB Processed (Tons)</th><th>Water Use (m³)</th><th>Ratio (m³/Tons FFB)</th></tr> </thead> <tbody> <tr> <td>January</td><td>9,732</td><td>13,438</td><td>1.38</td></tr> <tr> <td>February</td><td>8,105</td><td>10,968</td><td>1.35</td></tr> <tr> <td>March</td><td>10,550</td><td>14,842</td><td>1.41</td></tr> <tr> <td>April</td><td>8,631</td><td>12,489</td><td>1.45</td></tr> <tr> <td>May</td><td>14,930</td><td>18,858</td><td>1.26</td></tr> <tr> <td>June</td><td>15,803</td><td>19,591</td><td>1.24</td></tr> <tr> <td>July</td><td>16,832</td><td>21,058</td><td>1.25</td></tr> <tr> <td>August</td><td>16,789</td><td>23,540</td><td>1.40</td></tr> </tbody> </table>	Month	FFB Processed (Tons)	Water Use (m ³)	Ratio (m ³ /Tons FFB)	January	9,732	13,438	1.38	February	8,105	10,968	1.35	March	10,550	14,842	1.41	April	8,631	12,489	1.45	May	14,930	18,858	1.26	June	15,803	19,591	1.24	July	16,832	21,058	1.25	August	16,789	23,540	1.40	
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Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																								
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	<p>The plan aimed at improving the efficiency of fossil fuel usage, as outlined in Chapter IV of the <i>"Penilaian Cadangan Karbon dan Nilai Emisi GRK dari Alih Guna Lahan, 2017"</i> (Assessment of Carbon Reserves and Greenhouse Gas Emission Values from Land Use Change, 2017), has been effectively implemented by the company. This comprehensive plan includes measures to reduce fossil fuel consumption, such as:</p> <ul style="list-style-type: none">- Utilization of fibres and shells in the boiler.- Routine maintenance of all estate vehicles.- Optimum usage of electric generators.- A socialization program aimed at raising awareness about greenhouse gas emissions. <p>The company's commitment to reducing fossil fuel usage is evident in its efforts to optimize renewable energy sources. In particular, the utilization of methane capture serves as a commitment to the company's dedication to sustainable practices.</p> <p>Monitoring of renewable energy usage is documented in <i>"Monitoring Aplikasi Limbah Padat 2023"</i> (Monitoring of Solid Waste Application for 2023). Furthermore, detailed records of fuel consumption at the Palm Oil Mill (POM) during the year 2023 can be found in the <i>"Penggunaan</i></p>		Complied																				

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		<p><i>Solar PKS UAI Tahun 2023"</i> (Usage of Diesel at PT Usaha Agro Indonesia Palm Oil Mill for the Year 2023).</p> <table border="1"> <thead> <tr> <th>Month</th><th>Diesel (L)</th><th>Fiber (MT)</th><th>Shell (MT)</th></tr> </thead> <tbody> <tr><td>January</td><td>14,606</td><td>1,168</td><td>292</td></tr> <tr><td>February</td><td>15,070</td><td>973</td><td>243</td></tr> <tr><td>March</td><td>16,079</td><td>1,266</td><td>316</td></tr> <tr><td>April</td><td>16,513</td><td>1,036</td><td>259</td></tr> <tr><td>May</td><td>14,966</td><td>1,792</td><td>448</td></tr> <tr><td>June</td><td>12,374</td><td>1,896</td><td>474</td></tr> <tr><td>July</td><td>13,697</td><td>2,020</td><td>505</td></tr> <tr><td>August</td><td>13,961</td><td>2,015</td><td>504</td></tr> <tr><td>September</td><td>14,004</td><td>1,851</td><td>463</td></tr> <tr><td>October</td><td>13,962</td><td>2,041</td><td>510</td></tr> <tr><td>November</td><td>13,056</td><td>2,130</td><td>533</td></tr> <tr><td>December</td><td>16,220</td><td>1,765</td><td>441</td></tr> <tr> <td>Total</td><td>174,508</td><td>19,951</td><td>4,988</td></tr> </tbody> </table> <p>The company also conducted greenhouse gas (GHG) reporting submissions to the Roundtable on Sustainable Palm Oil (RSPO), demonstrating a commitment to transparent reporting and environmental responsibility.</p>	Month	Diesel (L)	Fiber (MT)	Shell (MT)	January	14,606	1,168	292	February	15,070	973	243	March	16,079	1,266	316	April	16,513	1,036	259	May	14,966	1,792	448	June	12,374	1,896	474	July	13,697	2,020	505	August	13,961	2,015	504	September	14,004	1,851	463	October	13,962	2,041	510	November	13,056	2,130	533	December	16,220	1,765	441	Total	174,508	19,951	4,988	
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<p>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.</p>																																																											

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7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has conducted assessment to identify significant pollutants and greenhouse gas (GHG) emissions across its estates, as detailed in the <i>"Penilaian Cadangan Karbon dan Nilai Emisi GRK dan Alih Guna Lahan"</i> (Assessment of Carbon Reserves and Greenhouse Gas Emission Values from Land Use Change) document. This assessment includes the calculation of TonC/Ha (Tons of Carbon per Hectare) and the estimation of GHG reduction potential per year. The RSPO New Development GHG Calculator has been employed for precise GHG emission calculations, ensuring accuracy and consistency.</p> <p>To address GHG emissions, the company has developed a comprehensive <i>"Program Mitigasi Emisi Gas Rumah Kaca"</i> (Greenhouse Gas Emission Mitigation Program). This program outlines the following key components:</p> <ul style="list-style-type: none"> - Program initiatives (e.g., optimizing manuring, conserving HCV areas). - Action plans (e.g., utilizing Empty Fruit Bunches to reduce fertilizer usage, monitoring and maintaining HCV areas). - Designated personnel responsible for implementation. - Timeframes for achieving specific objectives. <p>The unit of certification uses the latest version of the RSPO PalmGHG Calculator v.4 to evaluate GHG emissions resulting from its operations, available at Appendix B of this public summary report: GHG Reporting Executive Summary. Verification of the data input into PalmGHG during the audit confirmed the accuracy and validity of the recorded information.</p>	Complied
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans</p>	<p>The company has put in place a comprehensive plan to minimize greenhouse gas (GHG) emissions. This plan is detailed in Chapter IV: GHG Emission Mitigation Program and includes several strategies and</p>	Complied

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	<p>to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>options to effectively manage and reduce GHG emissions. Some key elements of this plan are as follows:</p> <ol style="list-style-type: none"> 1. Fertilizer Application Optimization: The company is optimizing fertilizer application by using Empty Fruit Bunches (EFB) and efficiently utilizing effluent discharge, which can contribute to reducing GHG emissions. Progress 2023: Total EFB utilized 29,813 MT. 2. Efficiency of Diesel Usage: To minimize GHG emissions associated with diesel usage, the company is making efforts to maximize the use of kernel and shell, conducting regular maintenance of vehicles, and limiting the operation of electricity generators. Progress 2023: Total diesel uses 174,508 MT which is 19% above the budget; Total shell uses as fuel 7,105.89 MT; Total fibre uses as fuel 19,951.36 MT. 3. Water Management at Peat Areas: Effective water management in peat areas is a critical aspect of GHG emissions reduction. The company is taking measures such as constructing water gates, installing piezometers to monitor water levels, and avoiding new planting on peat areas to prevent carbon emissions. Progress 2023: Water management has been implemented as mentioned in Criterion 7.7. 4. Maintenance of Conservation Areas: Conservation areas play a crucial role in absorbing carbon emissions. The company is actively identifying carbon stocks within High Conservation Value (HCV) areas and calculating carbon stock increments, which contributes to the overall GHG reduction efforts. Progress 2023: HCV Management and Monitoring has been implemented as mentioned in Criterion 7.12. 	
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		These strategies and initiatives reflect the company's commitment to responsible environmental management and its dedication to minimizing GHG emissions.	
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has documented a list of all polluting activities that contribute to greenhouse gas (GHG) emissions in the "<i>Penilaian Cadangan Karbon dan Nilai Emisi GRK dan Alih Guna Lahan</i>" document. Additionally, the document outlines a plan to reduce or minimize these identified pollutions and GHG emissions. This plan is designed to achieve specific objectives, including the evaluation of carbon stock estimations within PT Usaha Agro Indonesia, and it includes a timeframe for implementation.</p> <p>The Unit of Certification has formulated a strategy aimed at reducing and mitigating pollution and emissions within the plantation. This strategy involves the planned and systematic monitoring of pollution and emission quality, including ambient air quality assessments for boilers and power generators, water quality testing for surface and groundwater, evaluation of effluent water quality, and monitoring of noise levels. The findings from these monitoring activities are integrated into the Environmental Management and Monitoring Plan (RKL/RPL) and are regularly reported to the government.</p> <p>Measurement of other significant pollutant monitoring is carried out every six months. Records of test results are maintained and reported in the Environment Management and Monitoring Report. Air Quality Test Results for Generator and Boiler Emissions at UAI POM. Ambient air test results (based on PP No.41 of 1999 concerning National Ambient Air Quality Standards) at UAI POM and Estates. Testing was carried out by PT Mutu Agung Lestari; samples taken on 20 March 2023; test date 21 March – 5 April 2023, Report No. 0743/SL/III/23, 0744/SL/III/23, and 0745/SL/III/23. Chimney Emission Test results for Boiler, Genset No.1, and No.2 are as follows:</p>	Complied

		<table><tr><th>Parameter</th><th>UoM</th><th>Quality Standard</th><th>Boiler</th></tr><tr><td>Particulate</td><td>mg/m³</td><td>300</td><td>77.5</td></tr><tr><td>SO₂</td><td>mg/m³</td><td>600</td><td>28.0</td></tr><tr><td>NO₂</td><td>mg/m³</td><td>800</td><td>188</td></tr><tr><td>HCl</td><td>mg/m³</td><td>5</td><td><3.86</td></tr><tr><td>HF</td><td>mg/m³</td><td>8</td><td>1.22</td></tr><tr><td>NH₃</td><td>mg/m³</td><td>1</td><td>0.72</td></tr><tr><td>Cl₂</td><td>mg/m³</td><td>5</td><td>0.39</td></tr><tr><td>Opacity</td><td>%</td><td>30</td><td>11.3</td></tr></table> <table><tr><th>Parameter</th><th>UoM</th><th>Quality Standard</th><th>Genset No.1</th><th>Genset No.2</th></tr><tr><td>NO_x</td><td>mg/Nm³</td><td>3400</td><td>119</td><td>124</td></tr><tr><td>CO</td><td>mg/Nm³</td><td>170</td><td>75.3</td><td>55.5</td></tr><tr><td>Particulate</td><td>mg/Nm³</td><td>-</td><td>22.5</td><td>20.6</td></tr><tr><td>SO₂</td><td>mg/Nm³</td><td>-</td><td>18.0</td><td>12.0</td></tr><tr><td>Opacity</td><td>%</td><td>-</td><td>3.33</td><td>3.33</td></tr><tr><td>Water velocity</td><td>m/s</td><td>-</td><td>6.59</td><td>6.97</td></tr><tr><td>O₂</td><td>%</td><td>-</td><td>15.5</td><td>14.3</td></tr></table> <p>To effectively monitor the results and performance of GHG emission reduction efforts, the Unit of Certification calculates and periodically submits GHG values using the PalmGHG Calculator. This proactive approach enables the unit to track and evaluate its progress in reducing greenhouse gas emissions over time.</p>	Parameter	UoM	Quality Standard	Boiler	Particulate	mg/m ³	300	77.5	SO ₂	mg/m ³	600	28.0	NO ₂	mg/m ³	800	188	HCl	mg/m ³	5	<3.86	HF	mg/m ³	8	1.22	NH ₃	mg/m ³	1	0.72	Cl ₂	mg/m ³	5	0.39	Opacity	%	30	11.3	Parameter	UoM	Quality Standard	Genset No.1	Genset No.2	NO _x	mg/Nm ³	3400	119	124	CO	mg/Nm ³	170	75.3	55.5	Particulate	mg/Nm ³	-	22.5	20.6	SO ₂	mg/Nm ³	-	18.0	12.0	Opacity	%	-	3.33	3.33	Water velocity	m/s	-	6.59	6.97	O ₂	%	-	15.5	14.3	
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Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.																																																																															
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	The unit of certification unit has demonstrated commitment to the implementation of a zero-burning policy, as clearly outlined in the company's sustainability policy titled "Kebijakan Keberlanjutan PT		Complied																																																																											

		<p><i>Sampoerna Agro TBK</i>”, dated 1 October 2019. Additionally, the company has taken proactive steps by formulating two key procedures, namely “<i>Penebangan dan Pembersihan</i>” (P-SAG-KBN-PML-03) for land clearing and “<i>Tata Kelola Air Di Area Rendahan</i>” (P-SAG-KBN-PML-28) for water management at lowland to guide planting and replanting practices.</p> <p>Field observation was carried out across all estates, affirming that the certification unit refrains from any burning practices during development and cultivation activities. Notably, at the entrance to the certification unit, prominent signage prohibiting the use of fire is displayed. These informative signs are also strategically placed in high-risk areas, such as peatlands and housing zones. Interviews conducted with selected workers have further validated their awareness of and compliance with these fire prevention measures.</p>	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>Unit of certification established fire prevention and control measures for land such as provides Firefighting team and its equipment, established fire watch tower, conduct monitoring for hotspots and forming fire program by involving surrounding local communities.</p> <p>Available organisation structure of fire prevention of each estate, for example “<i>Struktur Organisasi Satgas Pengendalian Kebakaran Lahan dan Perkebunan PT UAI – Kebun Keruing Agro</i>” based on Memo No. 002/KAE-PT UAI/X/2023 dated 1 September 2023. The structure consists of Elder – Fardomuan Aritonang; Chairman – Sunawirawan; Secretary – Taat Susanto; PIC Prevention – Robi Siswoyo and Yunarno; PIC Fire control – Ricky E. and Romanus N. and Romanus N.; PIC Logistic – Rusni; Team A, consists of 15 personnel; Team B, consist of 15 personnel; Secondary Team consist of 10 personnel; Support Team consist of Village Head and communities.</p> <p>The company has installed warning and awareness signage throughout the premises, emphasizing the prohibition of fire usage and open burning. Additionally, observation towers have been strategically</p>	Complied

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		<p>positioned at specific locations, such as Block Q26 KAE and Block ID D18 MAE, with some towers reaching heights exceeding 15 meters. These towers serve as valuable points for monitoring the surroundings.</p> <p>Fire control equipment, including fire extinguishers, has been strategically placed at office buildings, housing areas, and the oil mill. Field fire control equipment has also available, such as water pump, jet shooter, water tank, etc. Interviews conducted with random mill and estate workers have demonstrated their understanding of the procedures to follow in the event of a fire emergency.</p> <p>The company's commitment to fire prevention is documented in the procedure "<i>Pengendalian Kebakaran Lahan dan Perkebunan</i>" (No. P-SAG-KBN-DRR-02), which outlines fire management practices, including the evaluation of readiness systems, facilities, and infrastructure. This document aligns with local legal requirements, particularly "<i>Permentan No. 05 Tahun 2018</i>". Fire incidents recorded on "<i>Laporan Kebakaran Lahan Perkebunan</i>", for example No. 003/LKLP/KAE/X/23, dated 7 Oct 2023 for fire incidents at borders of Block IQ0031, IQ0032 and IR0028 Division 4 KAE on 4-7 Oct 2023. Report completed with incident chronology, action taken, location of incident, pictures and map. The condition of fire has been eliminated on 7 Oct 2023 at 11.00 PM.</p> <p>Furthermore, the "<i>Peta Lokasi Rawan Kebakaran dan Embung</i>", a map or spatial model, has been developed to depict the field conditions related to the risk of fire events including water point within all estates. This aids in strategic planning and risk assessment.</p> <p>Available dissemination record of fire prevention to employees and local communities on 26 January 2024, attended by 32 participants, located at UAI main office's ground.</p>	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	The plantations of PT Usaha Agro Indonesia are situated adjacent to or within local communities, fostering a close relationship with the neighbouring stakeholders. To enhance accessibility and cooperation,	Complied

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	<p>- Minor compliance -</p>	<p>the company has thoughtfully provided road access to these surrounding communities. Notably, fire prevention signage has been strategically installed at key locations, including entrance points and junctions leading to adjacent villages.</p> <p>During stakeholder meetings with the local communities, the audit team gained information that the community members were not only aware of but also had a clear understanding of the significance of these fire prevention signs.</p> <p>Available document of formation of "Kelompok Tani Peduli Api (KTPA)" - Fire Care Farmer Group, Seguling Village, Manismata District, dated 26 September 2018. Minutes of the KTPA Training Activities and the handover of equipment and infrastructure for community-based fire prevention and control. A list of training attendees is available.</p> <p>Receipt of logistical items by KTPA in Jambi Village, Danau Buntar Village, Sukaramai Village, and Seguling Village, such as:</p> <ul style="list-style-type: none"> • Firefighter uniforms • Safety Boots • Walkie-talkies (HT) • Water pumps • Sunny hoses • Spiral hoses • Banners. <p>Available dissemination record of fire prevention to employees and local communities on 26 January 2024, attended by 32 participants, located at UAI main office's ground.</p>	
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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.

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PROCEDURAL NOTE for 7.12:

The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.

The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.

High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.

Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.

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

7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p>	<p>Based on topography maps and land use maps presented in the SEIA (Social and Environmental Impact Assessment) Report conducted in 2008, confirmed that the unit of certification location has not been overlap with primary forests.</p> <p>The unit of certification is situated adjacent to Production Forest and Production Forest for Conversion, as identified in the decisions of the Ministry of Forestry. In 2014, the forestry department of Indonesia updated these designations, and the land awarded to PT Usaha Agro Indonesia was categorized as "Areal Penggunaan Lain" (APL), which translates to land for other use.</p> <p>Since the initial clearing of the area after November 2005, the company has conducted a Land Use Change Analysis (LUCA) and a New Planting Procedure (NPP) assessment in 2016. The LUCA assessment was submitted to RSPO for verification and received approval with zero hectares of liability, as agreed by RSPO Secretariat on 8 December 2018. Therefore, no compensation plan is required.</p>	Complied
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		<p>The unit of certification has also undertaken High Conservation Value (HCV) assessments, covering all three estates within the production unit. These assessments were conducted by independent consultants, and the results identified a total of 227.43 hectares of HCV areas. It has been confirmed that no planting activities have been conducted within these identified HCV areas.</p> <p>Initial HCV assessments were conducted in 2011 and reviewed by the same consultant in 2017. Scope of the assessment is the nucleus area of PT Usaha Agro Indonesia (Keruing Agro Estate, Ulin Agro Estate and Meranti Agro Estate) and the smallholder area (Kopbun Jambi Mekar Jaya Sempurna, Kopbun Sempurna Mandiri and Kopbun Sempurna Bersatu). The 2011 assessment results were used as a baseline for the review process in 2017. All identified protected flora and fauna within the certification unit are documented in the HCV Verification Report. Some examples of identified species include certain plant species, mammals, and reptiles, all of which are essential for maintaining biodiversity.</p> <p>For the 2nd location permit (<i>Izin Lokasi Kedua</i>), a licensed assessor (Mr. Iwan Setiawan - ALS15039IS) conducted HCV assessments in 2016, covering a total area of 2,500 hectares. The report received a satisfactory score by HCVRN (High Conservation Value Resource Network) on 2 September 2016, and it summarized a total of 5.40 hectares of HCV management areas. From the 2,500 Ha permitted in Izin Lokasi, the land office (BPN) has issued HGU No.40/HGU/KEM-ATR/BPN/2018 (covering 1,383.1225 Ha). However, there is peat area with a total area of 616.87 Ha in this HGU. The peat area was planted in the period 2016 to 2017. This area known as Kruing Agro Estate - NPP Sanction and Ulin Agro Estate - NPP Sanction.</p> <p>Noted that there is NPP Sanction area of Kruing Agro Estate covers 715.90 Ha, and NPP Sanction area of Ulin Agro Estate covers 372.13 Ha.</p>	
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		<p>These areas are certified on 22 March 2021. Therefore, the sanction will be ended on 22 March 2024.</p> <p>For scheme smallholders areas (Koperasi Perkebunan Sempurna Mandiri – KPSM and Koperasi Perkebunan Jambi Mekar Jaya Sempurna – JMJS), HCV assessments were conducted in 2011 and 2016.</p> <p>There are plans to include an additional area under <i>Izin Lokasi Ketiga</i> (3rd location permit) covering 2,283 hectares, in the certification scope. Up to this ASA1_1, the area is still not included in the scope of certification.</p> <p>LUCA progress of PT Usaha Agro Indonesia for the 3rd location permit that sent by email, as follow:</p> <ol style="list-style-type: none"> 1. 6 June 2020: submission of LUCA report of PT Usaha Agro Indonesia additional 2283 ha area, for the review of RaCP. Responded by RSPO on 9 June 2020. 2. 15 June 2020: submission of LUCA report for PT Usaha Agro Indonesia new location 2283 ha according to LUCA guidance 2017. Responded by RSPO on 17 June 2020, asking for finalized HCV report date and submission of the social liability documents. 3. 22 July 2020: submission of social liability documents and HCV assessment and reporting of PT Usaha Agro Indonesia (UAI) additional 2283 ha that was conducted on Jan – April 2018 and the report finalized by assessor on 30 April 2018. The HCVRN Quality Panel review started on 31 Dec 2018 and satisfactory status on 20 April 2020. Responded by RSPO on 28 July 2020, notify that PT UAI's LUCA has been placed in the queue for review. 4. 22 September 2020: re-submit the social liability documents and map covering UAI's additional 2,283 ha area. Responded by RSPO on 2 December 2020: LUCA review report for PT UAI (extension) with the status "Needs clarification". 	
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		<p>5. 31 December 2021: submission of feedback for the review result from RSPO. Responded by RSPO on 4 January 2022: acknowledge receipt of the 1st LUCA Clarification data of PT UAI. On 18 April 2022, RSPO sent the 2nd LUCA review result of PT UAI, LUCA report status is "needs clarification".</p> <p>6. 27 July 2022: asking to discuss regarding the PT UAI 2283 ha boundary which needs to be clarified based on the results of the 3rd review. Responded by RSPO on 27 July 2022.</p> <p>7. 23 December 2022: resubmission of LUCA report, the area of the LUCA report for PT UAI's RaCP from the previous 2283 ha changed to 612 ha according to the area of IUP. Responded by RSPO on 18 April 2023: LUCA review report with the "Pass" status.</p> <p>During this ASA1_1, the unit of certification intended to extend the scope of certification by adding Scheme Smallholder – Koperasi Perkebunan Sempurna Bersatu. Land Use Change Analysis of this area has been covered in LUCA Report dated 20 February 2016, and get review result "Pass" on 26 September 2017.</p>	
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p> <p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>It has been confirmed during the audit that no land clearing activities which replace any primary forest, or any areas required to maintain High Conservation Values (HCVs) after 15 November 2018. The existing High Conservation Value (HCV) assessments, as explained in section 7.12.1 above, remain valid.</p> <p>It has been confirmed during the audit that no land clearing activities which replace any primary forest, or any areas required to maintain High Conservation Values (HCVs) after 15 November 2018. The existing High Conservation Value (HCV) assessments, as explained in section 7.12.1 above, remain valid.</p>	Complied

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7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	Not Applicable for Indonesia.	Not Applicable
<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>It has been confirmed during the audit that no land clearing activities which replace any primary forest, or any areas required to maintain High Conservation Values (HCVs) after 15 November 2018. Furthermore, as HCV management and monitoring plan, the company has established a <i>"Laporan Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi (KBKT) Tahun 2023"</i> as an integrated plan to protect and enhance High Conservation Value (HCV) and High Carbon Stock (HCS) forests, peatlands, and other conservation areas. This plan was developed in accordance with the recommendations of the HCV assessor, Dr. Nyoto Santoso, who is an ALS Provisionally Licensed Assessor (ALS14013MS). Recommendation from the HCV management and monitoring report 2023 are as follow:</p> <ol style="list-style-type: none"> 1. Land cover monitoring carried out every year to determine the dynamics of changes in land cover area in High Conservation Value and High Carbon Value Areas. <p>Progress status: Implemented as presented in <i>"Laporan Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi (KBKT) Tahun 2023"</i>.</p> <ol style="list-style-type: none"> 2. Dissemination of High Conservation Value, High Carbon Stock and Areas needs to be carried out every year as an awareness regarding Conservation Value and Management - Monitoring that can be 	Non-compliance

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		<p>carried out as well as things that can be avoided in High Conservation Value and High Carbon Value Areas.</p> <p>Progress status: Implemented as evidence: dissemination of HCV in Keruing Agro Estate on 17 February 2024, attended by 8 Staff, 18 Mandore, 239 worker and 2 Sustainability Team; in Meranti Agro Estate on 16 May 2023, attended by 3 Staff, 20 Mandore, 223 worker, and 1 Sustainability Team; in Ulin Agro Estate on 17 May 2023, attended by attended by 4 Staff, 8 Mandore, 173 worker, and 2 Sustainability Team.</p> <p>3. Marking of High Conservation Value and High Carbon Value Areas needs to be carried out at each boundary and carried out every year to ensure the existence of these boundaries so that KBKT and other areas can be identified and differentiated.</p> <p>Progress status: Partially implemented, as seen during field observation to HCV riparian of Sungai Danau Kapar. HCV boundary marker found in poles and yellow paints in oil palm trees.</p> <p>4. In implementing the Inventory of Natural Flora and Vegetation, it is necessary to create a Permanent Sample Plot which aims to determine the level of vegetation growth, the potential of natural vegetation and changes in the stratification of natural vegetation that make up the HCV.</p> <p>Progress status: Implemented as presented in <i>"Laporan Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi (KBKT) Tahun 2023"</i>.</p> <p>5. In order to improve the ecosystem of High Conservation Value Areas, it is necessary to carry out revegetation activities on identified open land cover in the area.</p> <p>Progress status: Not implemented.</p>	
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		<p>Critical Non-conformity:</p> <p>The unit of certification cannot demonstrate that all recommendation from HCV Management Plan has been implemented.</p> <ul style="list-style-type: none"> Based on field visit to HCV Riparian of Danau Kapar River at KAE and Riparian of Paya Tarung River at MAE whose land cover is bushes, no revegetation activities (plant enrichment) were found Based on field visit to HCV Riparian of Jambi River at UAE found that HCV signboard is in weathered condition. 	
7.12.5	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>It has been confirmed during the audit that no land clearing activities which replace any primary forest, or any areas required to maintain High Conservation Values (HCVs) after 15 November 2018. The rights of local communities have been respected and upheld through a negotiated agreement, facilitated by FPIC, fostering their active participation in the preservation and sustainable management of these vital conservation areas.</p> <p>HCV assessment of PT Usaha Agro Indonesia conducted by involving local communities. Participation of local communities gathered through public consultation on 4 March 2016. There is no right of local communities have been identified inside HCV areas and HCS forest, peatland and other conservation areas.</p>	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The company is actively implementing local regulations for the protection of wildlife within the certification unit. This commitment is clearly outlined in Memorandum (No. 012/Konsv-UAI/V/2017), which explicitly states the company's commitment to comply with Regulation No. 5 (1990) on the Conservation of Biological Resources and Ecosystems.</p> <p>The <i>"Laporan Pengelolaan dan Pemantauan KBKT/Kawasan Lindung PT. Usaha Agro Indonesia Tahun 2023"</i> – HCV management and monitoring report provides comprehensive records of the monitoring of flora and fauna conducted by the Sustainability Department – Research &</p>	Complied

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		<p>Development team of Sampoerna Agro TBK. This monitoring encompasses protected species as well as High Conservation Value (HCV) areas within the certification unit and is documented in the "<i>Daftar Temuan Satwa Liar</i>" which is updated monthly.</p> <p>The information gathered through these monitoring activities is then summarized for annual monitoring and management purposes, as evident in the "<i>Laporan Pengelolaan dan Pemantauan KBKT/Kawasan Lindung 2023</i>" (the latest report). The results of this monitoring have been instrumental in improving HCV areas, such as riverbank restoration and the installation of signposts. Additionally, patrol inspections and flora and fauna monitoring are integral components of HCV management and monitoring. This monitoring report was submitted to the Conservation Body of West Kalimantan in March 2024.</p> <p>Based on the report, wildlife found during the period consist of Long-tailed Parakeet (<i>Psittacula longicauda</i>), crimson sunbird (<i>Aethopyga siparaja</i>), Brahminy kite (<i>Haliastur indus</i>), crested hawk-eagle (<i>Nisaetus cirrhatus</i>), Elang Hitam (<i>Ictinaetus malayensis</i>), Elang Tikus (<i>Elanus caeruleus</i>), Kipasan Belang (<i>Rhipidura javanica</i>), Kelampiau (<i>Hylobates agilis</i>), Alang - Alap Capung (<i>Microhierax fringillarius</i>), Monyet Ekor Panjang (<i>Macaca fascicularis</i>), Biawak (<i>Varanus salvator</i>), Cipoh Jantung (<i>Aegithina viridissima</i>), Kerak Kerbau (<i>Acridotheres javanicus</i>), & Pergam Hijau (<i>Ducula aenea</i>).</p> <p>Furthermore, the company has taken proactive steps to raise awareness and knowledge about HCV and RTE (Responsible, Traceable, and Ethical) practices. Training sessions on these topics were conducted for local communities and workers, within the certification unit, e.g. in Keruing Agro Estate on 17 February 2024, attended by 8 Staff, 18 Mandore, 239 worker and 2 Sustainability Team; in Meranti Agro Estate on 16 May 2023, attended by 3 Staff, 20 Mandore, 223 worker, and 1 Sustainability Team; in Ulin Agro Estate on 17 May 2023, attended by 4 Staff, 8 Mandore, 173 worker, and 2 Sustainability Team.</p>	
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		During a site visit, it was observed that relevant signage regarding HCV and RTE was installed at appropriate locations within the plantation area, demonstrating the company's commitment to protecting and preserving biodiversity. Interviews with adjacent stakeholders confirmed their awareness of the company's dedication to these conservation efforts.	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The monitoring of High Conservation Value (HCV) areas is conducted on a monthly basis, reflecting the company's commitment to ongoing assessment and management of these conservation area. Annually, the certification unit compiles a comprehensive report specifically dedicated to the HCV managed areas. As example is the "<i>Laporan Pengelolaan dan Pemantauan KBKT/Kawasan Lindung 2023</i>" (the latest report).</p> <p>These reports serve as valuable sources of information and data, providing insights into the condition and changes within HCV areas over time. The information and findings from these reports considered in future management and monitoring plans for HCV areas.</p> <p>By systematically integrating the outputs and findings from these reports into subsequent management and monitoring plans, the company can adapt and refine its conservation efforts to ensure the sustained protection and enhancement of High Conservation Value areas within its operations.</p> <p>The latest HCV monitoring 2023, have resulted recommendations which has been described in indicator 7.12.4.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>It was confirmed that no land clearing has taken place after November 2005 for the phase 1 certification area. To address any historical land use changes and ensure compliance with RSPO requirements, the company conducted a Land Use Change Analysis (LUCA) and New Planting Procedure (NPP) assessment in 2016. The LUCA assessment was subsequently submitted to RSPO for verification and was approved with zero hectares (0.00Ha) of liability. Consequently, no compensation</p>	Complied

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		<p>plan was required, as agreed upon by the RSPO Secretariat on 8 December 2018.</p> <p>For the Phase 2 (ILOK 2,500 ha) area, High Conservation Value (HCV) assessments were conducted by an ALS licensed assessor (Mr. Iwan Setiawan - ALS15039IS) in 2016, covering a total area of 2,500 hectares. The HCV assessment report received a "Satisfactory" score from the HCVRN on 2 September 2016, summarizing a total of 5.40 hectares designated as HCV management areas. From the 2,500 Ha permitted in Izin Lokasi, the land office (BPN) has issued HGU No.40/HGU/KEM-ATR/BPN/2018 (covering 1,383.1225 Ha). This area has been included in certification scope by BV during ASA 2. However, there is peat area with a total area of 616.87 ha in this HGU, so that this area get sanction from RSPO. The peat area was planted in the period 2016 to 2017, with no NPP submitted. This area known as Kruing Agro Estate - NPP Sanction and Ulin Agro Estate - NPP Sanction.</p> <p>Additionally, for scheme smallholders' area (Koperasi Perkebunan Sempurna Mandiri – KPSM and Koperasi Perkebunan Jambi Mekar Jaya Sempurna – JMJS), HCV assessments were conducted in both 2011 and 2016.</p> <p>For the Phase 3 (ILOK 2,283 hectares) area, there is HCV report, titled "HCV Assessment of Oil Palm Plantation PT Usaha Agro Indonesia, Manismata, Ketapang, West Kalimantan", conducted by Neny Indriyana, identified HCV 1, HCV 3, and HCV 4 covering a total of 11.72 hectares with a status of "satisfactory." This demonstrates the company's commitment to responsible land use practices and conservation efforts. The 4th review of LUC Analysis dated 18 April 2023 was available stating that total area of management unit was reduced to 612 ha according to IUP; total area of raw liability was 57.74 ha; and total area of conservation liability was 0 (nil) ha.</p> <p>LUCA progress of PT Usaha Agro Indonesia that sent by email, as follow:</p>	
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		<ol style="list-style-type: none"> 1. 6 June 2020: submission of LUCA report of PT Usaha Agro Indonesia additional 2,283 ha area, for the review of RaCP. Responded by RSPO on 9 June 2020. 2. 15 June 2020: submission of LUCA report for PT Usaha Agro Indonesia new location 2,283 ha according to LUCA guidance 2017. Responded by RSPO on 17 June 2020, asking for finalized HCV report date and submission of the social liability documents. 3. 22 July 2020: submission of social liability documents and HCV assessment and reporting of PT Usaha Agro Indonesia (UAI) additional 2,283 ha that was conducted on Jan – April 2018 and the report finalized by assessor on 30 April 2018. The HCVRN Quality Panel review started on 31 Dec 2018 and satisfactory status on 20 April 2020. Responded by RSPO on 28 July 2020, notify that PT UAI's LUCA has been placed in the queue for review. 4. 22 September 2020: re-submit the social liability documents and map covering UAI's additional 2,283 ha area. Responded by RSPO on 2 December 2020: LUCA review report for PT UAI (extension) with the status "Needs clarification". 5. 31 December 2021: submission of feedback for the review result from RSPO. Responded by RSPO on 4 January 2022: acknowledge receipt of the 1st LUCA Clarification data of PT UAI. On 18 April 2022, RSPO sent the 2nd LUCA review result of PT UAI, LUCA report status is "needs clarification". 6. 27 July 2022: asking to discuss regarding the PT UAI 2,283 ha boundary which needs to be clarified based on the results of the 3rd review. Responded by RSPO on 27 July 2022. 7. 23 December 2022: resubmission of LUCA report, the area of the LUCA report for PT UAI's RaCP from the previous 2,283 ha changed to 612 ha according to the area of IUP. Responded by RSPO on 18 April 2023: LUCA review report with the "Pass" status. 	
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		During this ASA1_1, the unit of certification intended to extend the scope of certification by adding Scheme Smallholder – Koperasi Perkebunan Sempurna Bersatu. Land Use Change Analysis of this area has been covered in LUCA Report dated 20 February 2016, and get review result "Pass" on 26 September 2017.	
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Appendix B: GHG Reporting Executive Summary

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

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

The summary of the Net GHG emitted in **2023** for **Usaha Agro Indonesia Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.84
PKO	2.84

Extraction	%
OER	23.94
KER	4.35

Production	t/yr
FFB Process	166,261.31
CPO Produced	39,799.88
PKO Produced	7,230.08

Land Use	Ha
OP Planted Area	8,059.00
OP Planted on peat	1,782.65
Conservation (forested)	232.80
Conservation (non-forested)	0.00
Total	10,074.45

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	55,468.71	0.48	14,581.53	0.37	0.00	0.00	70,050.24	0.85
CO ₂ Emission from fertilizer	4,736.23	0.04	946.30	0.02	0.00	0.00	5,682.54	0.06
NO ₂ Emission from Peat	13,329.82	0.12	14.67	0.00	0.00	0.00	13,344.49	0.12
NO ₂ Emission from Fertilizer	3,671.35	0.03	787.68	0.02	0.00	0.00	4,459.03	0.05
Fuel Consumption	2,625.26	0.02	145.17	0.00	0.00	0.00	2,770.44	0.02
Peat Oxidation	97,225.67	0.85	107.01	0.00	0.00	0.00	97,332.68	0.85
Sink								
Crop Sequestration	-72,956.29	-0.64	-19,178.66	-0.48	0.00	0.00	-92,134.95	-1.12
Conservation Sequestration	-2,134.78	-0.02	0.00	0.00	0.00	0.00	-2,134.78	-0.02
Total	101,965.98	0.89	-2,596.29	-0.07	0.00	0.00	100,784.24	0.82

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	32,590.03	0.20
Fuel Consumption	434.29	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	33,024.32	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

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

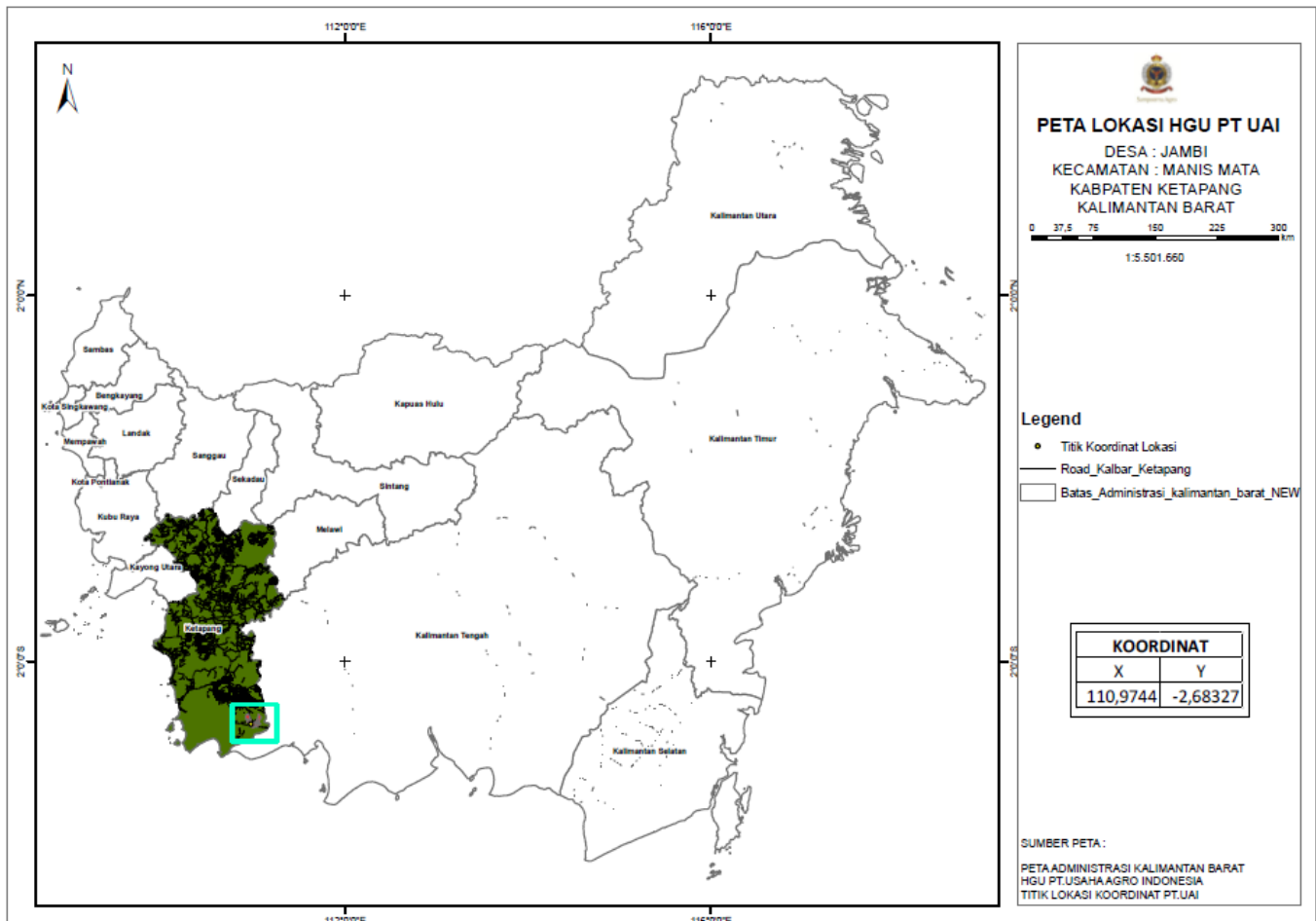
*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100.00

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

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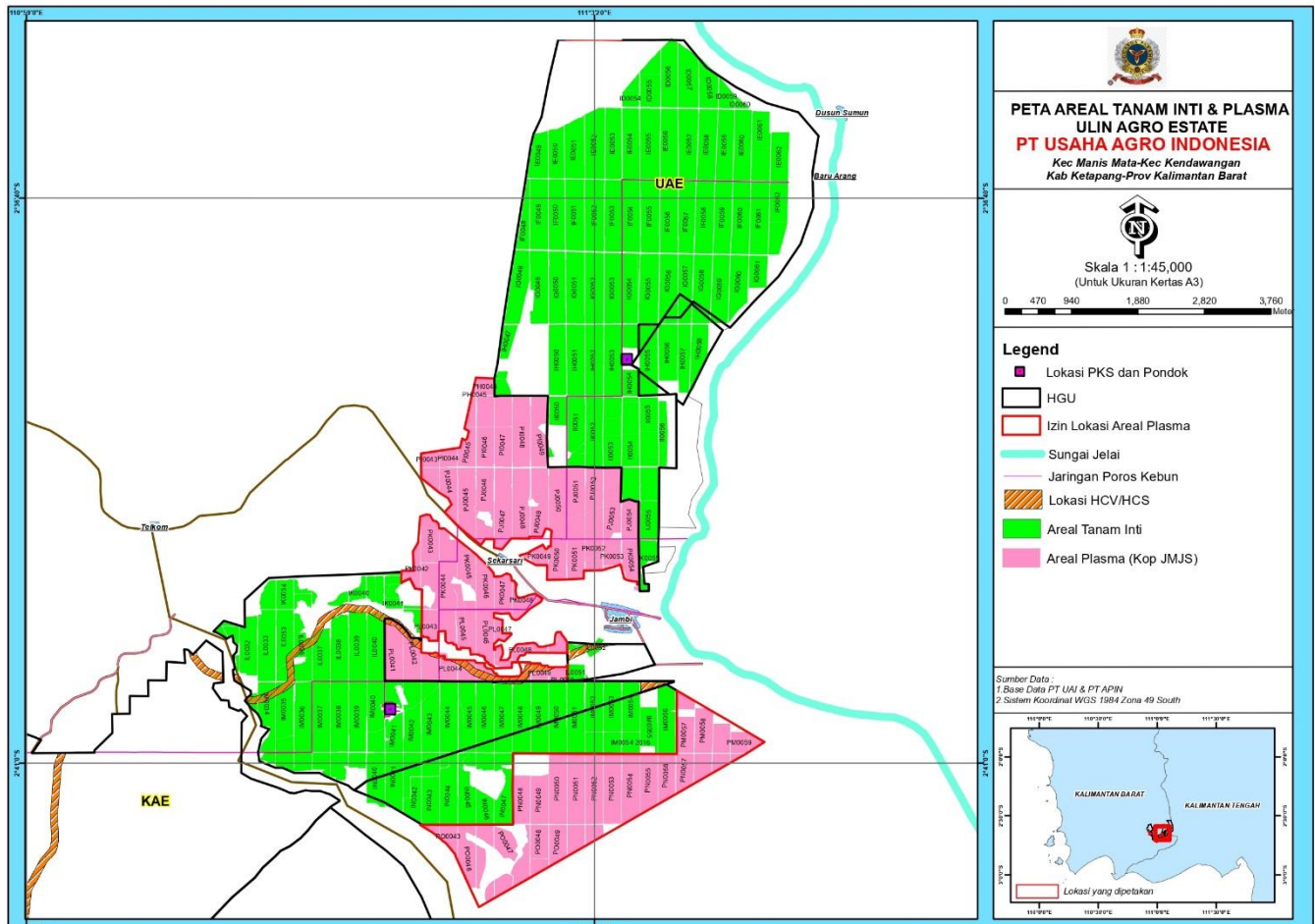
Appendix C: Location Map of Certification Unit and Supply bases



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Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other:
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied	N/A	N/A	N/A
Number of samples	N/A	N/A	N/A
Remarks	N/A	N/A	N/A

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total					N/A	N/A	N/A		

Note: * are smallholders sampled in this audit.

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