



RSPO PRINCIPLES & CRITERIA

(PUBLIC SUMMARY REPORT)



ANNUAL SURVEILLANCE AUDIT 1-1

Indonesia

PT SURYA SAWIT SEJATI- LADA POM (United Plantations Berhad)

26th - 29th August 2024

REPORT PREPARED BY:				
Dewi Akbari (Lead Auditor)				
REVIEWED BY:				
Muhd Jamalul Arif Bin Hamid	(Certifier)			

GLOBAL GATEWAY CERTIFICATIONS SDN BHD

No. 10, Jalan Rasmi 7, Taman Rasmi Jaya, 68000, Ampang, Selangor Darul Ehsan, Malaysia

(T): +603.4256 2689 (F): +603.4256 2687 (E): admin@ggc.my

GLOBAL GATEWAY CERTIFICATIONS

registered affiliate member

of

ROUNDTABLE ON SUSTAINABLE PALM OIL (RSPO)

RSPO Membership : 8-0196-17-000-00

number

Member since : 30/05/2017

Country : Malaysia

Affiliate membership : http://www.rspo.org/en/member/6445

GGC accreditation : ASI-088

certificate number

Date of Accreditation : 18/02/2019

Page 2 of 136



Audit Process Steps

Audit Planning completed	15/08/2024
Field audit completed	29/08/2024
Draft report completed	06/09/2024
Final report completed	24/09/2024
Report sent to Certifier	06/09/2024
Report sent to External Peer Reviewer	N/A
Certification Decision	27/09/2024
First Certification Decision	27/11/2018



Name: Dewi Akbari

Position: GGC Lead Auditor

Date: 24/09/2024

Page 3 of 136



Table of Contents

1.0 Executive Summary	5
1.2 Company details and Contact information	7
1.3 Certification Unit	8
1.4 Production Area, Actual and Projected FFB, CSPO & CSPK Production (MT)	9
Non-Certified FFB Supplier (Excluded from Certificate)	10
Scheme Smallholders/Scheme Outgrowers/Independent Smallholders/Outgincluded in the certificate	
This section is not applicable	11
Details of Scheme Smallholders related to certification	11
Details of Scheme Outgrowers related to certification	11
Details of Independent Smallholders related to certification	12
Details of Independent Outgrowers related to certification	12
1.5 Progress of associated Smallholders or Out-growers, if applicable to this assessmen	t12
Previous land users, if applicable to this assessment	12
1.6 Outsourced Activities / Contractors	13
1.7 Calculation of the Number of Production Units (N) to Sample for the Mill	14
1.8 Certification Details	14
2.0 Assessment Process	15
Summary of the findings for Multiple Management Unit	34
3.0 Assessment Findings by Principles and Criteria	36
Principle 1: Behave ethically and transparently	36
Principle 2: Operate legally and respect rights	38
Principle 3: Optimise productivity, efficiency, positive impacts and resilience	46
Supply Chain Requirements for Mills	60
Principle 4: Respect community and human rights and deliver benefits	67
Principle 5: Support smallholder inclusion	73
Principle 6: Respect workers' rights and conditions	76
Principle 7: Protect, conserve and enhance ecosystems and the environment	91
5.0 Details of Nonconformities and Area of Concern identified during this assessment	120
5.1 Major Nonconformities:	120





5.2 Minor Nonconformities:	120
5.3 Opportunity for Improvement	122
5.4 Non-conformity Raised from the Previous Year, if applicable	124
5.5 Noteworthy positive Components	124
6.0 Summary of GHG Emissions	125
7.0 Acknowledgement	127
7.1 Date of Surveillance Assessment Visit	127
7.2 Confidentiality	127
7.3 Signing of Report	127
7.4 Signing by the Certifier	127
Annex 1 – Audit Agenda	128
Annex 2 – Maps	133



1.0 Executive Summary

1.1 Objective, Audit Methodology, Certification Scope and Recommendation

Objective of Certification Assessment

United Plantations Berhad (UPB) has, over the years, grown in size and stature to emerge as one of the larger plantation groups in Malaysia and listed in the Main Board of the Bursa Malaysia. The Company principle business activity is the cultivation of oil palm and coconut and the processing of their products. Its subsidiary companies are engaged in several downstream activities such as specialty fats, soap products and trading in crude palm oil. The Company has, from a modest beginning in 1906, grown in size and stature. It presently has a total of 11 oil palm plantations in Malaysia and Indonesia (9 in Malaysia and 2 in Indonesia) covering approximately 62,513 hectares. Of which in oil palm plantations covering 46,227 hectares and coconut 4,627 hectares. Besides cultivation, UPB also operates 5 (five) palm oil mills (four in Malaysia and one in Indonesia), a refinery (Unitata Bhd) and a joint venture refinery (UniFuji Sdn. Bhd).

In Malaysia, UPB plantations are located in Perak and Selangor, while in Indonesia they are located in Central Kalimantan. In Malaysia, all the 4 palm oil mills process FFB from UP's own RSPO certified plantations. As per the Engineering head, all UP's mills run on green energy produced by their own biomass boilers and biogas plants. In Indonesia, the 60 MT/hour palm oil mill processes from UPB's own plantation as well as from associated smallholders and independent plantations. UPB have over 8000 hectares of set aside conservation areas within our Malaysian and Indonesian operations. UPB possesses considerable know-how in plant breeding, agronomy and tissue culture through its R&D facilities for the development of new and improved planting materials as well as improved crop husbandry practices. Through its sound managerial and technical expertise, UPB is today recognized as one of the highest yielding, cost competitive and innovative companies in Malaysia.

Global Gateway Certifications Sdn. Bhd. [thereafter known as GGC] has conducted the Annual Surveillance Audit (ASA 1-1) of PT Surya Sawit Sejati – Lada POM Complex from 26^{th} – 29^{th} August 2024 by 4 auditors to assess the compliance of the certification unit against the RSPO Principles and Criteria 2018 – RSPO INANI 2020, RSPO P&C Certification Systems November 2020 and RSPO SCC Systems documents 2020.

Audit Methodology

The methodology for collecting of objective evidence included physical site inspections, observation of tasks and processes, interviews of stakeholders, officers, review of documentation and data. Checklists and questionnaires were used to guide the collection of information and the comments made by external stakeholders were also taken into account in the assessment. Among the evidences sought to confirm the ongoing compliance of RSPO are includes of visiting chemical / pesticide / lubricant / schedule waste stores, estates and mill's operation activities such as manuring / spraying / harvesting / FFB processing / POME, observation of replanting and riparian areas, estates and mill's best practices, control measures for legal, social, environment and OSH practices, worker's social benefits such as worker's quarters and domestic waste managements.

Page **6** of **136**



Certification Scope Methodology

The approach to the audit was to treat the PT Surya Sawit Sejati subsidiary of United Plantations Berhad (Lada POM) and its supply bases as an RSPO Certification Unit. The assessment focused on compliance to legal requirements on the land title, land use rights, trainings on good agriculture practices, awareness towards environmental and conservation value management, waste management and disposal and plantation activities such as fertilising, chemical spraying and harvesting. Details of the actual assessment programme are given in Appendix A (Audit Plan). Some stakeholders were consulted randomly during the assessment to get their feedback on the management compliance and performance.

The assessment was conducted based on sampling approach as specified in RSPO Certification Requirement. The purpose of sampling audit, risk assessment of the certification unit was carried out prior to the assessment through the documentation (RSPO P&C Certification System 2020). Result of the Risk Assessment is then considered when considering the sampling calculations. There are total of 2 Estates supply bases supplying their FFB to Lada POM. Since there are only 2 estates in Lada POM Complex, therefore all 2 estates were audited and sampling not applicable. The 2 estates being sampled are Lada Estate and Runtu Estate.

Recommendation

The company has established Sustainability Manual for policy, objectives and procedures that define an effective system for the administration and control of sustainability management system throughout all operation activities of Lada POM. Estate Senior Manager, Managers and Mill Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual.

The management is committed to comply with RSPO system by giving awareness training to all personnel involved in this standard to make them understand the procedures and implementation of the standard. The employees are aware of the requirements of RSPO. There was no complaint or feedback received during this surveillance audit conducted.

The audit objectives against audit plan been achieved and assessment resulted with 0 (zero) Major Non-Conformity, 1 (One) Minor Non-Conformity and 3 (three) opportunity for improvement (OFI's) were raised. The action plans for Minor non-conformities has been accepted and will be verified during next Annual Surveillance Audit.

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted with no major non-conformity finding, therefore, the Lead Auditor recommends United Plantations Berhad – Lada POM to be continued with RSPO P&C certification.



1.2 Company details and Contact information

Company Name	PT Surya Sawit Sejati – Lada POM
Business Address	Desa Sungai Rangit Jaya SP6, Kec. Pangkalan Lada, Kab. Kotawaringin Barat, Kalimantan Tengah
Contact Person	Lee Kian Wei
Office Telephone	08115204801

E-Mail lkw@unitedplantations.com

1.3 Certification Unit

No	Name Of The	Site Address	Mill's	Supply	GPS Refere	nce of the
	Mill		Capacity	Chain	site o	ffice
			(MT/Hour)	Model	Longitude	Latitude
1.	Lada POM	Desa Sungai Rangit Jaya SP6, Kecamatan Pangkalan Lada, Kabupaten Kotawaringin Barat, Kalimantan Tengah	60	МВ	E 111°46′21′	S 02°35′27″

No	Name Of The Supply Base	Site Address	Age Profile		ice of the site
				Longitude	Latitude
1.	Lada Estate	Desa Sungai Rangit Jaya SP6, Kecamatan Pangkalan Lada, Kabupaten Kotawaringin Barat, Kalimantan Tengah	2004, 2005, 2006, 2007, 2008	E 111º43'23"	S 02°29′35″

Page 8 of 136



		Desa	Runtu,			
		Kecamatan	Arut			
2.	Runtu Estate	Selatan,	Kabupaten	2008, 2009	E 111º41'22"	S 02°22′31″
		Kotawaring	in Barat,			
		Kalimantan	Tengah			

1.4 Production Area, Actual and Projected FFB, CSPO & CSPK Production (MT)

		Area Summary (HA)	
Name Of The Supply Base	Land Title	Planted	Mature
Lada Estate	3,964.42	3,045.74	3,045.74
Runtu Estate	2,753.20	965.42	965.42
Total	6,717.62	4,011.16	4,011.16

Name Of The Complet Base	Area Summary (HA)			
Name Of The Supply Base	Conservation Area	HCV	Others	
Lada Estate	836.84	0	81.84	
Runtu Estate	1,750.82	0	36.96	
Total	2,587.66	0	118.80	

	FFB Summary (MT)			
Name Of The Supply Base	Projected from last audit (July 2023 – June 2024)	Actual Processed for 12 Months [July 2023 – June 2024]	Projected Production for next 12 Months [July 2024 – June 2025]	
Lada Estate	72,00	62,660.47	65,400	
Runtu Estate	18,000	18,542.35	19,600	
Total	90,000	81,202.82	85,000	

Note: Certified area only.



	Projected from last audit (July 2023 – June 2024)	Actual Processed for 12 Months [July 2023 – June 2024]	Projected Production for next 12 Months [July 2024 – June 2025]
FFB Summary (MT)	90,000	81,202.82	85,000
CSPO Summary (MT)	18,000	17,817.64	18,000
CSPK Summary (MT)	4,500	3,966.02	4,000

1.4.1 Certified CSPO & CSPK Data:				
For 12 months' period [July 2023 – June2024]	CSPO	CSPK		
Last license year's certified produced	17,817.64	3,966.02		
Last license year's actual sold volume	0	3,600		
Last license year's actual sold CSPO credits (where applicable)	0			

1.4.2 Non-certifed CPO & PK Data:				
Note: This section only for RSPO CSPO & CSPK produced but sold as others scheme				
For 12 months' period CPO PK				
Last license year's actual sold volume	0	0		

1.4.3 Non-certifed CPO & PK Data: Note: This section only for RSPO CSPO & CSPK produced but sold as non-certified				
For 12 months' period [July 2023 – June2024]				
17,817.64	366.02			
-	СРО			



Non-Certified FFB Supplier (Excluded from Certificate)

Name Of The Supply Base	Site Address	FFB Summary (MT) (July 2023 - June 2024)
Lada Estate Non-Certified Area	ı Pangkalan Laga, Kotawarındın Barat, L	
Runtu Estate Non-Certified Area	Desa Runtu, Kec. Arut Selatan, Kotawaringin Barat, Kalimantan Tengah	84,143.54
Desa Medang Sari, Kec. Arut Selatan, Arut Estate Kotawaringin Barat, Kalimantan Tengah		5,423.45
Kumai Estate	Desa Sungai Sekonyer, Kec. Kumai, Kotawaringin Barat, Kalimantan Tengah	12,752.95
Plasma PT SSS	Various Village	100,510.87
Koperasi Karya Tunggal Jaya	Desa Pangkalan Dewa, Kec. Pangkalan Lada, Kabupaten Kotawaringin Barat, Kalimantan Tengah	6,020.64
Desa Pangkalan Satu, Kec. Kumai, Koperasi Tani Bahagia Kotawaringin Barat, Kalimantan Tengah		10,011.32
CV Inti Sawit Perkasa	Desa Pangkalan Durin, Kec. Pangkalan Lada, Kotawaringin Barat, Kalimantan Tengah	5,684.25

Scheme Smallholders/Scheme Outgrowers/Independent Smallholders/Outgrowers included in the certificate					
□ This section is not applicable					
Type	Presence	Number			
Scheme Smallholders	Yes □ No 🏻				
Scheme Outgrowers	Yes □ No ⊠				
Independent Smallholders	Yes □ No ⊠				
Independent Outgrowers Yes ☐ No ☒					
Details of Scheme Smallholders related to certification					

Page 11 of 136



Name	Location	GPS ref	erence		ummary la)	Estimated FFB/Year (MT)	Planting Years
	Address	Longitude	Latitude	Total	Mature		
D-1-1166	TOTA			0	0		
Details of S	Scheme Outgro	wers related	i to certific	ation			
Name	Location	GPS ref	ference	Area Summary (Ha)		Estimated FFB/Year (MT)	Planting Years
	Address	Longitude	Latitude	Total	Mature		
	TOTA	 		0	0		
Details of I	Independent Sn		related to d	•			
Details of 1			ciated to t		1011		
Name	Location	GPS ref	ference		ummary la)	Estimated FFB/Year (MT)	Planting Years
	Address	Longitude	Latitude	Total	Mature	•	
	TOT *	1			0		
Dotaile of I	ATOTA		lated to se	0	0		
Details of 1	independent Ou	ligrowers re	elated to ce			Estimated	T
Name	Location	GPS ref		(H	ummary la)	FFB/Year (MT)	Planting Years
	Address	Longitude	Latitude	Total	Mature		
	TOTA	ı		0	0		
TOTAL			0	0			

1.5 Progress of associated Smallholders or Out-growers, if applicable to this assessment

Progress of associated Smallholders or Out-growers towards Compliance with relevant Standards - the mill shall develop and implement a plan to ensure that 100% of scheme smallholders and scheme outgrowers are compliant with the standard within three years of the mill's Re- certification.

**In monitoring compliance with this timeline, an observation shall be raised 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.

Previous	Previous land users, if applicable to this assessment						
Section	Requirement	Yes/No	If "Yes"	If "No"	Findings		
1.5.1	Are there any areas which were previously owned by other users and/or are subject to customary rights of local communities and indigenous peoples?		Go to 1.5.2	Section 1.5 is N/A			
1.5.2	Are list of previous land owners and contact details available?		Please fill up table below	-			
1.5.3	Were all the acquisitions done with a proper FPIC?		Yes	-			
1.5.4	Are there any acquisition agreements available?		Yes	-			
1.5.5	Were the acquisition agreements complied with?		Yes	-			

List of previous land owners				
OPP	Name	Year of acquisition	Contact details	
N/A	N/A	N/A	N/A	

Note: Contact details of previous land owners and consultation status. All previous land owners were sampled, unless unreachable.



1.6 Outsourced Activities / Contractors

The outsourced activities or contractors are third parties activities that fall inside the scope of certification.

Contractor Name	Type of Outsourced Activity	Location of Activity
CV. Hastina Graha Mandiri	Kontraktor Sipil	Runtu Estate
PT. Semesta Langgeng Sentosa	Pengangkut & Pengumpul Limbah B3	All Estate
Bumdes Karya Mandala Makmur	Transporter FFB	Lada Estate
Koperasi Produsen Pulau Benaning Sejahtera	Transporter FFB	Kumai Estate
CV. Aufa Nur Jaya	Transporter FFB	Lada Estate
PT. Berkat Karya Borneo Lestari	Transporter CPO	Mill
CV. Putri Windira Nurfadillah	Transporter FFB	Lada Estate
CV. Jhanuarta	Transporter FFB	Runtu Estate
PT. Rangit Indotama Jaya Mandiri	Transporter FFB	Lada Estate
CV. Ama Persada	Transporter FFB	Runtu Estate

1.7 Calculation of the Number of Production Units (N) to Sample for the Mill

Where sampling is required for a certification assessment, the sampling design shall include every mill and be based on a minimum sample of x estates, where $x = (0.8\sqrt{y}) \times (z)$, where y is the number of estates and where z is the multiplier defined by the risk assessment. A 'risk level' shall be set at:

Level 1 - low risk (multiplier of 1)

Level 2 - medium risk (multiplier of 1.2)

Level 3 - high risk (multiplier of 1.4)

The result always to be rounded "up" to the next whole integer. Sampling will be done where there are more than four estates or associated smallholders, otherwise all estates must be visited as part of the assessment.

Owned estates (Y)	$N = (0.8\sqrt{Y}) \times (z)$	Smallholders/outgrowers (S)	$N = (0.8\sqrt{S}) \times (z)$
2	2	_	-



1.8 Certification Details

Certification body	Global Gateway Certifications Sdn. Bhd., No. 10 Jalan Rasmi 7, Taman Rasmi Jaya, 68000 Ampang, Selangor Darul Ehsan, Malaysia. Tel.: +603 4256 2689; Fax: +603 4256 2687 - www.ggc.my
Assessment standard	 RSPO Principles and Criteria Standard – 2020 Indonesia National Interpretation (INANI) 2020 of the RSPO Principles and Criteria 2020 for sustainable palm oil production RSPO SCC Systems documents 2020
Certificate number	GGC-PTSSS-RSPO-AA5-2024
Start date certificate	27/11/2023
Expiration date certificate	26/11/2028
Date of first RSPO certification	27/11/2018
Recertification	By previous CB
Annual Surveillance 11 [ASA 11]	26 th August 2024 - 29 th August 2024
Annual Surveillance 12 [ASA 12]	September 2025 – November 2025
Annual Surveillance 13 [ASA 13]	September 2026 – November 2026
Annual Surveillance 14 [ASA 14]	September 2027 – November 2027

Page 15 of 136



2.0 Assessment Process

2.1 Qualification of the Lead Assessor and Assessment Team

Lead Auditor

Name: Dewi Akbari

Graduate in Agriculture Science and Agribusiness from University Sriwijaya with more than 20 years of experience in various work scopes covering auditing, inspection and certification consultant. Also, having more than 5 years of experience as an Auditor / Lead Auditor in audit schemes such as ISPO and RSPO P&C/RSPO SCCS. Attended and successfully completed the RSPO Lead Auditor certification refresher course conducted in July 2022. Successfully completed the ISO 9001 Quality Management System (QMS) course for Lead Auditors in 2009. Also completed the RSPO ISH training in March 2022. Also completed the Social Accountability - SA 8000 training in May 2024. Understand the law – Indonesian local laws. Can speak and understand Indonesian and English.

Auditor 1

Name: Burhanuddin Gala

Burhanuddin has attended some trainings i.e Roundtable Sustainable Palm Oil (RSPO) Lead Auditor Course, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Course, Environmental Impact Assessment (EIA), High Conservation Value Forest/Area (HCVF/A), Social Impact Assessment (SIA), Standard LEI 5000-1/5000-2/5000-3, Sustainable Forest Management Certification (PHPL), Timber Legality Verification (SVLK), T-Bosiet Course with guidance set by IMO/STCW95, UKOOA, OPITO, OGP, NFPA & AHA. He also has work experience such as i.e a Researcher and non-permanent lecturer at Anthropology Department, Faculty of Social and Political Science, University of Indonesia. Can speak and understand Indonesian and English.

Auditor 2

Name: Rahayu Zulkifli (RY)

Bachelor of Laws, Liverpool John Moores University, England. SMETA Requirements Training (April 2021), RSPO Lead Auditor Refresher Course by Checkmark Training (Feb 2021), Social Systems Foundation Training Course (based on SA 8000:2014) (2018), RSPO-endorsed RSPO P & C Lead Auditors Refresher Course (2018), MSPO Auditor Training conducted by SIRIM (2017), RSPO Principle & Criteria Workshop by SIRIM (2017), ISO 14001 Lead Assessor course by Exemplar Global (2016), Social Aspects of the RSPO P&C by SIRIM (2016), RSPO-endorsed Lead Auditor course (2014).

Rahayu is also a trained and certified Mediator. Can speak and understand Indonesian and English.



Auditor 3

Name: Dwi Haryati

Graduate Bachelor degree Faculty of Agriculture, Jenderal Soedirman University with more than 10 years of experience in various work scopes covering Agriculture. Also, having more than 5 years of experience as an Auditor / Lead Auditor in various audit schemes such as ISPO, ISO and RSPO P&C. Attended and successfully completed the RSPO Lead Auditor certification refresher course conducted in February 2024. Successfully completed the course in IRCA Lead Auditor ISO 9001:2015; ISO 14001:2015; and ISO 45001:2018 in 2023. Understand the law – Indonesian local laws. Can speak and understand Indonesian and English.

Local Expert / Observers (If applicable)

Name: N/A

Peer Reviewer (if applicable)

Name: N/A

2.2 Stakeholder Consultation

During this surveillance audit, the audit team has conducted stakeholder consultations involving both internal and external stakeholders as to understand the practices in relation to environmental, social performance and their performance with respect to the RSPO requirements. The meeting was conducted without the present of mill and estate management.

At the start of meeting, the auditor explained the purpose of the audit followed by an evaluation of the relationship between the stakeholders before discussions continued. The auditor recorded comments made by stakeholders and verified with the mill and estate management before incorporating into the assessment findings. There was no complaint or feedback received during the audit or during the field assessment when interviewing with the external and internal stakeholders.

No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken.	Assessment team findings [Outcome]
1	WS (Head of Plantation Division) Agriculture and Plantation Agency of Kotawaringin Barat Regency	Issue positive: a. Company relations and communication is quite good, if there is a problem it is resolved quickly, response is fast. b. The company's performance in the field of plantation management is quite good, obeying the law, active licensing and orderly routine reporting. c. In the company there are	No action requires	Positive findings

Page **17** of **136**

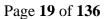


		no issues of pollution due to plantation operational activities, overlaps with mining area permits, there are no issues of abandoned land, and land fires. d. Fire fighting facilities/infrastructure are adequate according to applicable regulations. e. CSR activities have been implemented well in the surrounding community.		
		Issue negative : -		
	DC Co. Mb	Expectation: a. The company already has a CSR program and realizes it every year, it is necessary to increase the volume of assistance provided to minimize the possibility of social disturbances that could occur. b. Some people still expect plasma from the company even though the obligations related to the percentage of plasma/reproductive activities have been fulfilled by the company.	Will be addressed by the	Varification
2	RS Sp. Mh Industrial	The dispute related to harvesting wages, as outlined in Indicator 6.1.6	Will be addressed by the company through more	Verification has been
	Relation Staff at Manpower Office, Kotawaringin Barat Regency	oudined in Indicator 6.1.6	socialization of the piece-rate system.	conducting and explained further on indicator 6.1.6
3	RM S. Pol Mediator Industrial	The dispute related to harvesting wages, as outlined in Indicator 6.1.6	Will be addressed by the company through more	Verification has been conducting

Page 18 of 136



	Relation at Manpower Office, Kotawaringin Barat Regency		socialization of the piece-rate system	and explained further on indicator 6.1.6
4	MR (Sekretaris Kades Desa Sumber Agong)	Issue positive a) No land conflicts. b) Available job opportnities offered by PT Surya Sawit Sejati. c) Plasma farmers. Issue negative: a) Sometimes there is too much bureaucracy involved when applying for CSR from the PT SSS. b) No response to requests made and local community feels frustrated. c) CSR offered sometimes may not tally with what the local communities need. d) Not aware of grievance mechanism. Expectations: a) Transparency especially in communications. b) Local community and PT SSS must have good cooperation with each other.	Action taken to resolve the non-conformities: 1. A revised template (Stakeholders logbook) to be included where the complainant will be kept informed on the status of request/grievance. 2. A memorandum has been sent to all Heads of Departments on 28 August 2024 to conduct briefing on the grievance redressal procedure. 3. A briefing will be conducted for all staff and workers on the person in-charge of recording the request/grievance. Similar briefing will be conducted for all external stakeholders including the local communities during the stakeholders meeting.	Raised as an non-compliance under Indicator 3.3.2
5	Nur Salim – Kades Desa Sg Rangit Jaya	Positive Issue: a) No land conflict. b) Relationship with PT SSS is generally good. Negative Issue: c) CSR needs improvement and is very minimal. d) Not clear about grievance mechanism.		Raised as an non-compliance under Indicator 3.3.2



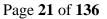


		e) Requests we made sometimes receive no response, or late. We need to know either way so if PT SSS cannot help, we can quickly find alternatives. Expectations: a) Our village is wthin Ring 1 (nearest to the planatation) and should be given priority when it comes to CSR opportunities.		
6	Liza Apriani (USAID)	Positive issues: 1. Good collaboration received on project to assist Koeprasi Karya Tunggal Jaya to be RSPO certified. 2. Extremely good effort in protection the forest buffer zone of Tg Putting National Park, with the aim of making it a local protected area. One of the areas (around 700 ha) is included in the Company's HGU.	No action requires	Positive findings
		Negative issues: -		
7	YP (Orang Utan Foundation UK)	 a) The Company helps with regular orangutan surveys inside its HCV area within the Company's HGU. b) The Company can be considered as a role model for its routine and consistent manner in 8conducting the orangutan surveys. 	No action requires	Positive findings
8	ARF	Positive issues: a) Was invited for stakeholder meeting in June	Action taken to resolve the non–conformities:	Raised as an non-compliance

Page 20 of 136

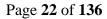


or
.01



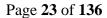


		offered himself to be a mediator on issues related to the local community.	
9	MA (Kades Desa Sg Malawen)	Positive issues: a) Offers job opportunities to the local community. b) We receive animal feed and fertiliser. c) No land disputes. The Company is paying 3 million rupiah per months as compensation to the village for land acquisition. d) Generally relationship with Humas is good.	Raised as an non- compliance under Indicator 3.3.2
		Negative issues: a) Proposal for CSR sent in May 2024 for road going to the plasma area. Was told by Humas officer that due to weather conditions, it was not suitable time. Kades sent a reminder by WhatsApp on 25/6/2024, Humas replied on 29/7/2024, and we are still waiting for progress. b) Not sure about grievance mechanism.	
		Aspirations: a) Fire simulation – instead of villagers going to the Company, it would be better if the training be done at the village so more can benefit. b) More CSR contributions. c) Please respond to our request within a reasonable timeframe.	
10	ASM (Kepala SD 2 Lada Mandala Jaya)	Positive issues: a) The Company provides scholarship to deserving students.	Raised as an non- compliance under





		Negative issues: a) Proposal to request for traditional costume for school performance was lost by the Company. Re-sent another one on 6/5/2024 and on 11/6/2024 the Humas officer requested for an image so that they can buy it. Now it has been more than 2 months and we are still waiting for a response. b) There is a perception that the Company is not transparent. In 2021, was asked to sign on a blank form and was told it's for money received for a volleyball court. c) Not aware of grievance procedure. Aspirations:	Indicator 3.3.2
11	AI(BUMDES Desa Umpang)	Positive issues: a) Plasma farmer and the Company helps him with maintenance, harvesting and evacuation to the Mill. b) Receives monthly income from the FFB sold to Lada POM. The detailed calculations are clear and easily understood. No complaints about the partnership agreement. Negative issues: a) Not clear about whether he gets to keep his land ownership certificate now that his loan has been cleared. b) Unhappy about FFB	Raised as an non-compliance under Indicator 3.3.2





sometimes not being harvested frequently and loose fruits left on the	
ground. A WhatsApp message was sent on 10/5/2024 to estate	
management and reply was "we will improve" but situation remains. c) Not sure about grievance	
mechanism. Aspirations:	
a) Company pays compensation of 25 million rupiah per month to the village. But the community	
feels that this amount need to be increased as it is too little and not enough to be used for development.	
b) For Company to offer business opportunities to the villagers e.g. transporter, etc.	

2.3 Minimum Requirements for Multiple Management Units

Organizations that have multiple management units, and/or a majority holding in and/or management control of more than one autonomous company growing oil palm, will be permitted to certify individual management units and/or subsidiary companies under certain conditions. A majority shareholding is defined as the largest shareholding; where the largest shareholdings are equal (e.g. 50/50) this applies to the organization that has management control. This process is permitted only if all of the following are complied with

Requirements for time-bound plan

RSPO Certifications Systems Requirements	The parent organization or one of its majority owned and / or managed subsidiaries is member of RSPO
Summary	RSPO Member Name: United Plantations Bhd, Membership No: 1-0004-04-000-00 Category: Ordinary / Sector: Oil Palm GrowersCountry/Territory: Malaysia

Page 24 of 136



F28-Report-RSPOPC-Rev09 Client Code: AA5 Report Number: GGC-AA5-ASA11/RSPOPC-V01-2024

Audit ID: AUD ASA11/2024

	Member since: 20 July 2004. Web: <u>www.unitedplantations.com</u> .							
	In Compliance	\boxtimes	Yes		No		Not Applicable	ž
RSPO Certifications Systems Requirements	(a) A statem managin (b) Ditto in r	nent of gage respection for	of the uncy contact of each	ultimate con npany/com th of the o ership by t	ntrollir panies peratin he top	ng shareho s. ng groups. asset owni	owing are required Iders and directo ing company/com any/companies	rs in the
Summary	This is not application operating units are							d all the
	In Compliance		Yes		No		Not Applicable	j
If one of the above	e-mentioned require	ments	s is non	-compliant	, this le	eads to a m	najor non-conform	nity.
units and/or holding	irements about a tings (3.3) are applicated and if one or more of	able if	the re	gistered RS	SPO me	ember is th	e holding compar	
RSPO Certifications Systems Requirements	A time-bound plan units where the or submitted to the of containa current list	ganis CB du	ation ha	as manage e initial ce	ment o	control and	l/or minor shareho	olding, is
Summary	United Plantations May 2023 as seen It has covered/stathe organisation has countries refer to l	on "ī ted all as ma JP an	Table of I manag nagemenual rep	f Time Bou gement un ent control port year 2	ind Pla its and for oil 023.	n for Unite /or entities palm secto	ed Plantations Bho including the uni or in Malaysia & I	d" below. its where ndonesia
	In Compliance							
RSPO Certifications Systems Requirements	As a minimum, all obtainingRSPO me Any new acquisideviationsfrom the	embers tions	ship. shall l	be certifie	d with	nin a thre	ee-year time fra	me. Any
Summary	UPB have obtainin its supply bases i Tanarata estate b	n Mal	laysia h	nave obtai	ning R iired by	SPO certifi y UPB in y	icate on year 200	08 except
				Da ~ ~ 25 .	.f 126			





have RSPO certified on year 2022. Based on condition above that UPB has complied to RSPO P&C Certification System.

Whereas, Unit of Certification on behalf PT Surya Sawit Sejati (PT SSS) in Indonesia have successfully obtained RSPO certificate in November 2018 and November 2019 (scope extention) but there are part of PT SSS areas (Lada estate and Runtu estate) and scheme of smallholders from PT SSS (lada estate) still uncertified till year 2024. UPB has changed plan year for certification from year 2023 to year 2025 and it have obtaining approval from RSPO secretariat about the proposed new timeline for certification under UPB (part of PT SSS areas and its scheme of smallholders) dated on 26 May 2023

⊠ Yes In Compliance □ No Not Applicable **RSPO** Progress towards this plan shall be verified and reported in subsequent annual **Certifications** surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB that first accepted the time-bound plan, the later CB shall accept Systems the appropriateness of the time-bound plan at the moment of first involvement and Requirements shall onlycheck continued appropriateness. Summary The Certification Body (CB) conducting the surveillance audit on year 2024 is different from the CB that first accepted the TBP so that the current CB has only checked continued appropriateness. The current CB has verified progress toward new TBP that part of PT SSS areas and scheme of smallholders from PT SSS still uncertified till year 2024 but it is not deviation from proposed new timeline for certification i.e year 2025. In Compliance ⊠ Yes No ☐ Not Applicable

Requirements for uncertified management units and/or holdings

RSPO Certifications Systems Requirements a) 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. Any new plantings since 1 January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB



Summary

The company has identified HCV area for Lada Estate and Runtu Estate in 2008. However, the identification result is not considered sufficient by the company since there is no information on the hectare of HCV area and the location of the identified HCV. Therefore, the company re-identify the HCV area and delineate the HCV area based on HCV identification 2006. The delineation is conducted by Biodiversity Team of the company. Based on the delineation of HCV area there is HCV area that is opened by the company. The company has submitted RaCP proposal and successfully obtained the approval on 4th October 2019.

In 2014, the company has also conducted HCV identification for smallholder scheme area and Kumai Arut Conservation Area for the area of 1,121.2 ha. However, the area of 49.572 ha is highly potential be opened as housing area of Benaning Bawah Villagers. The information is based on community aspiration to exclude the area from HCV area of Kumai Arut Estate Scheme Smallholder.

The company with assigned consultant has approached and counselled local community through FPIC method. The company has consulted to RSPO Jakarta Office on 9 May 2016 in accordance with this situation for RSPO to accommodate community aspiration without disobey RSPO requirement on new area development.

RSPO Certifications Systems Requirements

(b) Land conflicts, if any, are being resolved through a mutually agreed process, such as the 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.

Summary

The company has a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP: SSS-COMDEV (HMS)-024). The mechanism regulated the flow chart process. It is equipped with complaint form.

In Compliance ⊠ **Yes** □ No □ Not Applicable

RSPO Certifications Systems Requirements

(c) Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2.

Summary

Procedure for calculating and distributing fair compensation has been in place in the similar document Procedure for calculating and distributing fair compensation has been in place in the similar document of SOP land compensation No. HRD-015-R00 dated 1st January 2016. It explains that the company has a standard of compensation calculation but also giving the compensated person a bargaining/negotiation position.

The record of compensation process and outcome of negotiated agreement is documented. Based on interview with the community, the community has understand the procedure of land

Page 27 of 136



	compensation and their involvement in the compensation process. The result of the compensation process is distributed to the compensated party and can be accessed by stakeholder through information request
	In Compliance Yes No Not Applicable
RSPO Certifications Systems Requirements	(d) Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1.
Summary	Personnel in charge to manage the legal documentation system are Legal Department (Led by Ibu Dewi). A system used for tracking any changes in laws and regulations was set-up trough procedure No: SOP-HRD-017-R00.
	In Compliance Yes
RSPO Certifications Systems Requirements	 (e) CBs shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with the requirements 5.5.3 (a)–(d) above based on self-declarations by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach: A positive assurance statement is made, based upon self-assessment (i.e., internal audit) by the organisation or assessment carried out by an accredited CB. Evidence of the assessment against each requirement shall be demonstrated and if there is non- compliance whether the non-compliance has been actively addressed or communicated RSPO Where applicable, targeted stakeholder consultation, including consultation with therelevant NGOs, will be carried out by the CB Desktop study e.g., web check on relevant complaints If necessary, the CB may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.
Summary	PT. Surya Sawit Sejati has conducted annual RSPO internal audits periodically. The latest internal audit was carried out on 12 February to 15 March 2024. The positive assurance statement is made available in the internal audit report that the business units are in compliance with RSPO P&C. CB will carried out the stakeholders consultation to the uncertified units with the relevant NGOs comment. As per period of audit, there is not complaint to area of uncertified units. Verify with the RSPO website and also UP Berhad website.
	Page 28 of 136



F28-Report-RSPOPC-Rev09 Client Code: AA5 Report Number: GGC-AA5-ASA11/RSPOPC-V01-2024

Audit ID: AUD ASA11/2024

								CB will carried out the irements at uncertified
	In Compliance	\boxtimes	Yes		No		Not App	plicable
RSPO Certifications Systems Requirements	as stated in the certified manag proceed to a su	RSP(Jemer Iccess	O P&C. If a nt unit is ide sful conclusi	non- entification un	compliand, the control of the contro	ince against a cr current certificat	ritical indication assets. E	Evidence of active
Summary	Based on descripti	on 5.	5.3 (a)-(d)	abov	e that a	ll requirements	are com	pliance status
	In Compliance	\boxtimes	Yes		No			Not Applicable
RSPO Certifications Systems Requirements	defined in 5.5.3	3 (f) a	bove may l	ead t	o suspe		ate of th	ertified unit(s) as ne certified unit(s), in
Summary	Based on description unit still active	on 5.5	5.3 (f) abov	e that	no any	non-compliance	ce so ce	rtificate of the certified
	In Compliance		Yes		No			Not Applicable
RSPO Certifications Systems Requirements	as stated in the certified manage	e RSP(gemer	O P&C. If a nt unit is ide	non- entifie	complia ed, the		ritical indication	l and non-critical is dicator in a non- essment cannot
	Evidence of act available.	ive er	ngagement	with	RSPO ii	n resolving the r	on-com	npliance shall be
Summary	Based on descripti	on 5.	5.3 (a)-(d)	abov	e that a	Il requirements	are com	pliance status
	In Compliance		Yes		□ No		Not A	pplicable
RSPO Certifications	defined in 5.5.3	3 (f) a	ibové may l	ead t	o suspe		ate of th	ertified unit(s) as ne certified unit(s),

Page 29 of 136



F28-Report-RSPOPC-Rev09 Client Code: AA5 Report Number: GGC-AA5-ASA11/RSPOPC-V01-2024

Systems Requirements					
Summary	Based on descript certified unit still a	ncce so certificate of the			
	In Compliance	Yes	☐ No		Not Applicable



^{**}CBs shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements above by the CB based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable.

Time Bound Plan for United Plantations Bhd

Name of the Unit of Certification	of Country Mills and		Location Address	GPS Coordinates (in decimal degree)		Total Managed	Certification Status (Certified / Not	Plan Year for
(UoC)		Bases		Latitude	Longitude	Area (Ha)	certified)	Certification
Jendarata POM	Malaysia	Jendarata POM	Jalan Kuala Selangor – Teluk Intan, Jendarata Estate 36009 Teluk Intan, Perak,Malaysia	3.853889°N	100.968333 ° E	Located inthe managed area of Estate	Certified	Not Applicable
UIE POM	Malaysia	UIE POM	KM 9, Jalan Bruas- Ayer Tawar, 34900 Pantai Remis, Perak,Malaysia	4.448056°N	100.719722 ° E	Located inthe managed area of Estate	Certified	Not Applicable
Ulu Bernam Optimill	Malaysia	Ulu Bernam Optimill	Up River BussinessUnit, 36500 Ulu Bernam, Perak, Malaysia.	3.821944°N	101.220556 ° E	Located inthe managed area of Estate	Certified	Not Applicable
Ulu Basir POM	Malaysia	Ulu Basir POM	Up River BussinessUnit, 36500 Ulu Bernam, Perak, Malaysia.	3.72 4444 °N	101.255833 ° E	Located inthe managed area of Estate	Certified	Not Applicable
Jendarata Estate	Malaysia	Jendarata Estate	Jalan Kuala Selangor – Teluk Intan, Jendarata Estate 36009 Teluk Intan, Perak,Malaysia	3.9° N	100.9775°E	6,335.64	Certified	Not Applicable
UIE Estate	Malaysia	UIE Estate	KM 9, Jalan Bruas- Ayer Tawar, 34900 Pantai Remis, Perak, Malaysia	4.443889°N	100.722778 ° E	10,365.20	Certified	Not Applicable
Seri Pelangi Estate	Malaysia	Seri Pelangi Estate	Batu 11 ¾, Jalan Bidor, 36008 Teluk Intan, Perak, Malaysia	3.993611°N	101.159444 ° E	1,422.00	Certified	Not Applicable

Page 31 of 136



Name of the Unit of Certification	Country	Name of the Mills and Supply	Location Address	GPS Coordinates (in decimal degree)		Total Managed	Certification Status (Certified / Not	Plan Year for
(UoC)		Bases		Latitude	Longitude	Area (Ha)	certified)	Certification
Ulu Bernam Estate	Malaysia	Ulu Bernam Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	3.746111°N	101.148889 ° E	3,197.59	Certified	Not Applicable
Changkat Mentri Estate	Malaysia	Changkat Mentri Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	3.758333°N	101.24° E	2,550.53	Certified	Not Applicable
Charong Estate (Chawang & Erong)	Malaysia	Charong Estate (Chawang & Erong)	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	3.803611°N	101.221667 ° E	6,900.76	Certified	Not Applicable
Lima Blas Estate	Malaysia	Lima Blas Estate	Selangor, Selangor, Malaysia.	3.792222°N	101.351667 ° E	2,745.00	Certified	Not Applicable
Ulu Basir Estate	Malaysia	Ulu Basir Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	3.7243157°N	101.253536 2° E	3,990.80	Certified	Not Applicable
Tanarata Estate(Newly acquiredin 2019)	Malaysia	Tanarata Estate (Newly acquired in August 2019)	Batu 7, Jalan Changkat Jong, 36008 Teluk Intan,Perak	3.969722°N	101.096667 ° E	3,641.82	Certified	Not Applicable
Lada POM	Indonesia	Lada POM	Village of Sungai Rangit Jaya, Sub District of Pangkalan Lada, District of Kotawaringin Barat, Province of Kalimantan Tengah	2.493056° S	111.723056 ° E	Located inthe managed area of Estate		Not Applicable

Page 32 of 136



Name of the		Name of the			rdinates		Certification Status	
Unit of Certification	Country	Mills and Supply	Location Address	(in de degi	cimal ree)	Total Managed	(Certified / Not	Plan Year for
(UoC)		Bases		Latitude	Longitude	Area (Ha)	certified)	Certification
Lada Estate	Indonesia	Lada Estate	Village of Sungai Rangit Jaya, Sub- District of Pangkalan Lada, District of Kotawaringin Barat, Province of Kalimantan	2.493056°S	111.723056 ° E	3,964.42 (713.4 + 3,250.95)	Certified	Not Applicable
Runtu Estate	Indonesia	Runtu Estate	Tengah Village of Runtu, Sub District of Arut Selatan, District of Kotawaringin Barat, Province of Kalimantan Tengah	2.375278°S	111.689444 ° E	2,753.20	Certified	Not Applicable
Lada Estate (balance of HGU)	Indonesia	Lada Estate	Village of Sungai Rangit Jaya, Sub District of Pangkalan Lada, District of Kotawaringin Barat, Province Kalimantan Tengah	2.493056°S	111.723056 ° E	2,097.60 (1,796.6 (HPK) + 215 (APL) + 46 (APL) + 12.26 (HGB) + 27.73 (Hak Pakai))	Not Certified	2025
Runtu Estate (balance of HGU)	Indonesia	Runtu Estate	Village of Runtu, Sub of District Arut Selatan, District of Kotawaringin Barat, Province of Kalimantan Tengah	2.375278°S	111.689444 ° E	4,626.00 (4,491.4 (APL) + 130 (APL) + 4.6 (HGB))	Not Certified	2025
Lada Estate (Plasma Lada,Runtu, Arut & Kumai)	Indonesia	Lada Estate (Plasma Lada, Runtu, Arut & Kumai)	Plasma Lada: Village of Sungai Rangit Jaya, Sub District of PangkalanLada, District of Kotawaringin Barat, Province of	 Plasma Lada : 2.49305 6° S Plasma Runtu : 2.37527 8°S 	 Plasma Lada: 111.72 3056° E Plasma Runtu: 111.68 	2,382.18 (833 (Hak Milik) + 431.88 (Hak Milik in progress) + 1.48 (HGB) + 1,115.82	Not Certified	2025

Page **33** of **136**



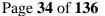
Name of the Unit of Certification	Country	Name of the Mills and Supply	Location Address	GPS Coordinates (in decimal degree)		Total Managed	Certification Status (Certified / Not	Plan Year for
(UoC)		Bases		Latitude	Longitude	Area (Ha)	certified)	Certification
			Kalimantan Tengah Plasma Runtu : Village of Runtu, Sub District of Arut Selatan, District of Kotawaringin Barat, Province of Kalimantan Tengah Plasma Arut : Village of Medang Sari, Sub District of Arut Selatan, District if Kotawaringin Barat, Province of Kalimantan Tengah Plasma Kumai : Village of Sungai Bedaun, Sub District of Kumai, District of Kotawaringin Barat, Province of Kalimantan Tengah Province of Kalimantan Tengah	2.62333 3°S	9444° E • Plasma Arut : 111.65 5833° E • Plasma Kumai: 111.84 8056° E	(Hak Pakai))		

Above marked * is combination of total rubber and palm oil area within stated plantation where the exact certified or under certification of each plantation will be according to the respective public summary report

Summary of the findings for Multiple Management Unit

The audit team assessed compliance with the above requirements during this audit. Failure to address any non-compliance identified may lead to certification suspension.

The assessment of minimum requirement for multiple management units for United Plantations Berhad (UPB) was found to be in compliance with the requirement of section 4.5 of the RSPO Certification Systems for Principles and Criteria. United Plantations Berhad (UPB) has registered with RSPO with a membership: 1-0004-04-000-00 since 19 July 2004. The management of United Plantations Berhad (UPB) has plan to certify all the complexes starting from 2024 until 2025. The time bound plan is a bit behind schedule as On going process of getting HPK, APL, HGB for building, Hak Pakai conseravtion area and waiting for Awaiting the lifting of their suspension to resume the process, United Plantations Berhad (UPB) has sent a request to RSPO Secretariat on the revised time bound plan and latest changes approved in 23 May 2023 with following justification:





Time Bound Plan							
Palm Oil Mill	Country	Supply Bases (estates, plantations, associations)	Targeted RSPO Certification Year	Current Certification Status as per this Audit			
Lada Estate (Balance HGU)	Indonesia	Lada Estate	2023 forward to 2025	HPK - Process Pelepasan is ongoing at the Environment and Forestry Department Jakarta. Awaiting the Integrated Team to conduct on the ground survey and upon completion of Pelepasan Process, the SK Pelepasan from the Minister of Environment and Forestry Department Jakarta will be issued. APL - Panitia B process and on the ground survey by Integrated Team. Currently we are proceeding to HGU application at Land Office. HGB for building - Has been obtained. As there is no oil palm planting on HGB area, we plan to conduct RSPO Scope Extension Assessment when HGU has obtained for the area under HPK & APL. Hak Pakai for conservation area - Awaiting payment of BPHTB (tax) to Bapenda and issuance of Hak Pakai. As there is no oil palm planting on this area, we will conduct RSPO Scope Extension Assessment along with the HPK and APL area as stated above			
Runtu Estate (balance HGU)	Indonesia	Runtu Estate	2023 forward to 2025	APL - Awaiting Land Office to conduct Kadastral to produce HGU boundary map and thematic survey before the next step i.e forming Panitia B and producing outcome and decision of committee. Next, SK HGU will be issued and payment of BPHTB (tax) shall			

Page **35** of **136**



				be made before issuance of HGU. HGB for building - Has been obtained. As there is no oil palm planting on HGB area, we plan to conduct RSPO Scope Extension Assessment when HGU has obtained for the area under APL.
Lada Estate (Plasma Lada, Runtu, Arut & Kumai)	Indonesia	Lada Estate (Plasma Lada, Runtu, Arut & Kumai)	2023 forward to 2025	Hak Milik - 833 ha has received Hak Milik, however there are 431.88 ha in progress of issuing Hak Milik. HGB for building - Has been obtained. As there is no oil palm planting on HGB area, we plan to conduct RSPO Scope Extension Assessment when Hak Milik has fully obtained. Hak Pakai for conservation area - Awaiting payment of BPHTB (tax) to Bapenda and issuance of Hak Pakai. As there is no oil palm planting on this area, we will conduct RSPO Scope Extension Assessment along with the HPK and APL area as stated above



3.0 Assessment Findings by Principles and Criteria

Principle 1: B	ehave ethically and transparently	
Indicator	Summary of Findings	Compliance (Y/N) and NC#
1.1.1 (C)	Management documents specified in the RSPO P&C are made publicly available. These include: - land rights - health and safety programmes - social and environmental impact assessments - pollution prevention plans - details of grievances - continuous improvement plans - ISPO and RSPO certificates - human rights policy. Stakeholders were informed of the availability of the documents during stakeholder meeting held on 23 July 2023. During the meeting also, each stakeholder was given a Stakeholder Handbook which contains information on documents that are publicly available.	Yes
	The documents are also shared and available on the Company's website https://unitedplantations.com/up	
1.1.2	All the information provided have been prepared in Bahasa Indonesia. These documents are accessible to relevant stakeholders in accordance with SOP on internal & external communication No. SSS-HRD-26-R00 dated 1/6/2023. During the stakeholder meeting on 26/6/2023, a Stakeholder Handbook was given which contains the list of documents that the stakeholders can have access to.	Yes
1.1.3 (C)	Records of requests for information and responses are maintained. The relevant SOP is SOP-HRD-03-R00 dated 1/1/2014 which states that any documents received will be recorded, reviewed and referred to the Management. The Management will provide its decision and this decision will be communicated to the applicant between 7-30 days from the date the application or request for information is received. Sighted during the audit were requests for information from surrounding local communities who asked if they could be given POME solids which they wanted to use in the making of animal feed. Also	Yes

Page 37 of 136



	sighted included a written request for information from Dinas Pertanian Pangkalan Bun dated 21/12/2023 asking if Kelompok Tani BABEL Desa Batu Belawan could have some of the POME solids. This was responded to by the Company via letter dated 3/2/2024 to Dinas Perkebunan informing that the POME is ready for collection.	
1.1.4 (C)	It was verified that the Company's Consultation and Communication Procedures are documented in SOP SSS-01-HMS-15 dated 1 Jan 2015, revised on 10/12/2023. This procedure was disclosed and made available to all relevant stakeholders during the stakeholder meeting held on 26 July 2023 in Pangkalan Bun attended by various external stakeholders such as contractors, suppliers, local communities, schools, village heads.	Yes
	During the stakeholder meeting, they were briefed by the relevant representatives of the certification unit on topics such as company policies, grievance mechanism, and the CSR application procedures.	
	A Stakeholder Handbook written in Bahasa Indonesia was also issued to all stakeholders present. This Handbook contains all the company policies such human rights policy, whistleblowing policy, grievance mechanism, process of land conflict resolution, prohibition against the killing of orang utans, etc.	
1.1.5	A current list of stakeholders updated in August 2024 is available and verified during the audit. The stakeholder list contains contact details of all stakeholders such as address, telephone and email numbers, as well as their nominated representatives.	Yes
	The stakeholders include relevant government agencies related to environment, agriculture, labour, contractors, suppliers, surrounding local communities, nearby schools, FFB suppliers, etc.	
1.2.1	A Policy for ethical conduct (<i>Kebijakan Tentang Pedoman Perilaku dan Etika Bisnes</i>) is available and sighted during the audit. The Policy was signed by the President Director on 1/10/2022. The Policy states the Company's zero tolerance to fraud, bribery and corruption which applies to all dealings by its employees, suppliers, consultants, agents and any person associated with UP. It also states that it will conduct its operations with honesty, integrity and openness, and with respect for the human rights and interests of its employees.	Yes
	Socialisation of the Policy was made on 25/7/2024 to all levels of employees and to external stakeholders on 26 July 2023.	
	This Policy is also included in the agreements signed with third parties. Sampled during the audit was the agreement No. 003/SPK/ED-PT.SSS/II/2024 signed between PT Surya Sawit Sejati &	

Page **38** of **136**



	CV Hastina Graha Mandiri dated 12/2/2024 Nombor which contained a clause on the compliance of the Company's Code of Business Ethics.	
1.2.2	A system is in place to monitor compliance and implementation of the policy and overall business practice include carrying out annual internal audits and external audits. The Company conducted its internal audits from 12-15 March 2024. Based on interviews with local communities and external stakeholders, there was no evidence of corruption, bribery, conflict of interest situations or unethical conducts.	Yes
Principle 2: C	perate legally and respect rights	
Indicator	Summary of Findings	Compliance (Y/N) and NC#
2.1.1 (C)	The Lada POM certification unit is under the company PT Surya Sawit Sejati has a list of legal requirements and regulations that support the RSPO scheme which is updated annually at the time of management review. Based on a document review, the list of legal regulations for the second semester of 2023 includes the name of the legal regulations, the agency that issued them, the substance and relevant articles. The company has list of regulations of 2024 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as: Legal & Land Legality Decree of the Head of Plantation Office of Kalimantan Tengah Province No. 188.43/526/PUPKP3/DISBUN dated March 15, 2019 regarding the Determination of Follow-up Suggestions for increasing the business class of PT Surya Sawit Sejati oil palm plantations in Kotawaringin Barat Regency, Kalimantan Tengah Province in 2018, in the attachment it is stated that Plantation Class I (Excellent). Plantation Business Permit for Processing (IUP-P) for PT Surya Sawit Sejati, Decree of the Kotawaringin Barat Regent No. Ekbang/525.26/102/EK/2010 dated 28 April 2010. Location of Pangkalan Lada and Arut Selatan Subdistricts Sungai Rangit Jaya Village, Umpang and Suayap, Kotawaringin Barat Regency, Kalimantan Tengah. Plantation area 15,650 Ha Factory Capacity 60 Tons FFB/Hour. HGU Decree from the National Land Agency No: 81/HGU/BPN/2005 dated July 4, 2005, located in Lada	Yes



- Mandala Jaya Village and Sungai Rangit Jaya Village, expiry date of 24 September 2040. Measurement Letter Number 1 dated 8 April 2005 with an area of 2,508.472 Ha. Valid for HGU Certificate number 42.
- HGU Decree from the State Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 1/HGU/KEM-ATR/BPN/2018 dated January 2 2018, Locations in Sungai Rangit Jaya Village, Pangkalan Durin Village, Sungai Melawen Village, Lada Mandala Jaya Village, Pangkalan Dewa and Pandu Sanjaya Village, Pangkalan Lada District, and Runtu, Kenambui and Umpang Villages, Arut Selatan District, valid until January 1, 2053 with a total area of 6,004.15 Ha. Valid for HGU Certificates number 58 – 74 (18 certificates).
- HGB Decree from the Head of the Kotawaringin Barat Regency Land Office No. 01/HGB/BPN/62.01.2016 dated 30 June 2016 and HGB Certificate No. 02 dated 11 July 2016 on a land area of 1.651 Ha located in the Village/Pangkalan Durin District with the expiry date of the rights until 24 September 2046.

In term of legal and permit regulation compliance, company are able to show several documents, such as Location Permit and Land Tenure or Land Use Right (HGU). Beside that CH also has had business permit consist of:

- Plantation Business Permit (*Izin Usaha Perkebunan/ IUP*) on behalf of PT Surya Sawit Sejati Lada Esstate in 2006 for oil palm plantation as large as 4,000 Ha, SK Bupati Kotawaringin Barat No.EKBANG/525.26/597/XII/2006 dated 30 December 2006
- Plantation Business Permit (*Izin Usaha Perkebunan/ IUP*) on behalf of PT Surya Sawit Sejati runtu Esstate in 2006 for oil palm plantation as large as 9,000 Ha, SK Bupati Kotawaringin Barat No.EKBANG/525.26/598/XII/2006 dated 30 December 2006

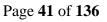
Compliance with Environment Regulation:

 Lada POM dan Lada Estate. Dokumen Analisis Dampak Lingkungan (ANDAL) for PT Surya Sawit Sejati's Palm Oil Plantation and Processing Mill activities located in Sungai Rangit Jaya Village, Lada Mandala Jaya and Pangkalan Durin, Pangkalan Lada District, Kotawaringin Barat Regency through the Decree of the Kotawaringin Barat Regent No. 660/580/Bpdl- II.2/XII/2007 concerning Environmental Feasibility of Plantation and Palm Oil Processing Factory Development PT Surya Sawit Sejati was stipulated on December 1, 2007 with an area of 6,650 ha, factory capacity

Page 40 of 136

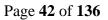


	of 60 tons of FFB/hour	
	• Runtu Estate. Dokumen Analisis Dampak Lingkungan (ANDAL) for PT Surya Sawit Sejati for Oil Palm Estate activity in Villages of Rangda, Sulung Kenambui, Runtu, and Sumpang, subdistirct of Arut Selatan, Kotawaringin Barat, KalimantanTengah Province. Approved bt Regional AMDAL assessing board of Kotawaringin Barat Regency No. 656/359/Bpdl-II.2/VII/2007 with total area 9.000 ha through the approval from government of Kotawaringin Barat Regency,Regional Environmental Impact Controlling Agency No. 660/359/Bpdl-II.2/VII/2007 dated July, 27 2007.	
	 Environmental management report for the second semester of 2023 which was reported to the Kota Waringin Barat Regency Environment Agency on April 17, 2024. Report on the management of hazardous and toxic waste materials for the quarter II of 2024 which was reported to the Kotawaringin Barat Regency Environment Agency on July 31, 2024. 	
	Report on the management of liquid waste for the quarter II of 2024 which was reported to the Kotawaringin Barat Regency Environment Agency on July 31, 2024.	
212	 Compliance with Worker Welfare Aspect Mandatory Employment report PT Surya Sawit Sejati with reporting number 28382.20240704.0001 dated July 4, 2024. The implementation of the minimum wage in 2024 is in accordance with the Minimum Wage Decree of the Kotawaringin Barat Regency established by the Governor of Central Kalimantan. Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017. 	Voc
2.1.2	The company has a complete list of regional, national and international regulations and the level of compliance in the form of a list of legal requirements and a summary of the evaluation of compliance with statutory regulations covering administrative and physical aspects of the field. Updating regulations is carried out through legal identification through newspapers, internet access and other sources.	Yes
	The company has had a system to identify the legal requirement related to plantation business. All requirement documented in regulation list that set by Human Resources and General Affair Department. It kept in mill and estate office. To ensure all	





	operational activities in accordance with applicable regulations, they update the regulations and implementation also every semester. Whole process performs by Human Resources and General Affair Department. Internal audit of regulations compliance is conducted annually as example on 9 – 20 February 2024 in PT Surya Sawit Sejati.	
2.1.3	Procedure of legal boundary stakes monitoring and maintenance is presented in SOP Restriction Number SSS-EST-06 dated December 10, 2017. Procedure mentioned that maintenance was carried out by officers who have been appointed by the Estate Manager and Assistants . Monitoring the boundaries of the HGU at least once a year.	Yes
	The company shows the document for monitoring the HGU stake which is carried out every year. The report on the inspection and maintenance of the boundary markers has provided complete information regarding the number of stakes, condition of stakes, location of stakes, coordinates of stakes and corrective actions as well as the target time for repairs if there are damaged or missing stakes. In the monitoring report, it is known that all HGU stakes are available.	
	The company can also show documents related to the number of stakes in each HGU plot of land with the following details: Lada Estate Map of land parcels No. 28-15.06-2016 (90.42 Ha) there are	
	108 stakes • Map of land parcels No. 106-15.06-2016 (222.90 Ha) there are 109 stakes	
	 Map of land parcels No. NIB 15.06.00.00.00079 (464.0 Ha) there are 40 stakes 	
	 Map of land parcels No. 101-15.06-2016 (480.10 Ha) there are 63 stakes 	
	 Map of land parcels No. 32-15.06-2016 (588.8 Ha) there are 59 stakes 	
	Map of land parcels No. 33-15.06-2016 (678.4 Ha) there are 87 stakes Map of land parcels No. 34.15.06 2016 (238.4 Ha) there are	
	 Map of land parcels No. 34-15.06-2016 (328.4 Ha) there are 46 stakes Map of land parcels No. 35-15.06-2016 (103.64 Ha) there 	
	are 37 stakes • Map of land parcels No. 36-15.06-2016 (261.7 Ha) there are	
	48 stakes • Map of land parcels No. 85-15.06-2016 (10.62 Ha) there are 7 stakes	

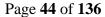




	 Map of land parcels No. 86-15.06-2016 (22.01 Ha) there are 5 stakes. Runtu Estate Map of land parcels No. 37-15.06-2016 there are 28 stakes Map of land parcels No. 38-15.06-2016 there are 29 stakes Map of land parcels No. 102-15.06-2016 there are 56 stakes Map of land parcels No. 39-15.06-2016 there are 21 stakes. Field observations to several HGU boundary markers in Lada Estate Div 1 (No.50, 51 and 52) and Runtu Estate Div . Plot Area show that the poles sampled during the audit were available in the field and in well-maintained conditions. Based on the results of field observations as well as interviews with the relevant PIC officers, it is known that the HGU stakes are in good condition, the position of the stake area is clean, there is no indication of land use outside the HGU. 	
2.2.1	The company has kept a list of contractors working for the company. This list is recorded in the PT SSS contractor list document. List of all contractors updated July 2024, including contractors for transporting hazardous waste and maintenance of mill machinery, has been maintained by the certification unit. The company already has a list of contractors for 2024 which is contained in the list of stakeholders updated on July 2024. The list contains information regarding the name of the contractor, person in charge, address and telephone/email where they can be contacted. The types of services listed in the list of contractors are FFB transportation, CPO transportation, CPO and PK transportation workers, and hazardous waste transportation. The contractor is still actively doing his work at PT SSS. In the list of contractors for 2024 there are 19 contractors, including Buyer CPO and PK, as below:	Yes

2.2.2

	traktor	
No.	Nama	Unsur
1	CV. Hastina Graha Mandiri	Kontraktor
2	PT. Semesta Langgeng Sentosa	Pengangkut -Pengumpul Limbah B3
3	Bumdes Karya Mandala Makmur	Transporter FFB
4	Koperasi Produsen Pulau Benaning	Transporter FFB
_	Sejahtera.	
5	CV. Aufa Nur Jaya	Transporter FFB
6	PT. Berkat Karya Borneo Lestari	Transporter CPO
7	CV. Putri Windira Nurfadilah	Transporter FFB
8	CV. Jhanuarta	Transporter FFB
9	Rangit Indotama Jaya Mandiri	Transporter FFB Kontraktor
	CV. Sumber Baru	
	Triputra Borneo Adhitama	Kontraktor Kontraktor
12	PT. Rahmalisa Gaung Lada Mustika CV. Alfath	Kontraktor
_	CV. Ama Persada	Transporter FFB
	CV. Cipta Guna Abadi	Kontraktor
od	uct Buyer	
0.	Nama	Unsur
1	PT. Wilmar Tbk	Buyer CPO/PK
2	PT. Kurnia Tunggal Nugraha	Buyer PK
3	PT. Citra Borneo Utama	Buyer CPO
nt e d ici	certification unit has pro ractors, number of employed ements, and ensured other n and regulations in Indones document also includes a list of ocument verification, there as h explains the contractor's sportation of FFB and empty be sportation, chipping/replantin	tors for estate and mill activities perly documented the list es owned, contact persons, wo natters related to compliance witia. It was further explained the of stakeholders in the area. Base of 15 contractors in estate and mean operational services such counches, construction of mill, so g, etc., where the list contain contract holder (vendor), address umber etc.
ise ite o.0	d on the results of a review of des Karya Mandala Makmur d 02 January 2024 ; PT 32.A/SPK-CPO/SSS-PTBK/I/20	of contract agreements (example contract No. 012/SPK-SSS/I/20 Surya Sawit Sejati contra 124 dated 02 January 2024, a revealed that the type of contra
uil	able was a reflewable contrac	L1





Yes

Based on the results of the review of contractor documents listed in

indicator 2.2.1, it is known that the company has evaluated contractor based on procedur No.SSS-HRD-24-R00 Contractor Selection and

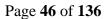
Evaluation, revision 00, dated June 01, 2023.

	Contractor evaluation procedures (forms and attached evidence of validation of requirements) do not accommodate all regulations that must be complied with by contractors.	
	The company shows a list of local contractors for 2024. For example, the FFB transportation contractor at Lada Estate, namely PT Berkat Karya Borneo and can prove compliance with relevant legal obligations, including: • Have a cooperation agreement for the transportation of FFB	
	 between PT SSS and PT Berkat Karya Borneo. Have a work agreement between the contractor and their employees, for example letter of agreement with the initial W, in the letter of agreement it is regulated regarding the type of work and place of work, working days and hours, terms and conditions of work, validity period of the agreement, wages, rights and obligations, and expiration of the agreement period Work. 	
	 Registering its employees as members of Social Assurance in the Pension plan, Life insurance, Accident insurance and pension guarantee programs, for example proof of payment for Social Assurance for the June 2024 period with a "Paid" status. Minimum Wage for Kotawaringin Barat Regency, for example 	
	 Millimum Wage for Rotawaringin Barat Regency, for example payslips for July 2024 initial P total salary received Rp. 5,228,763 with salary components including Basic Wages, overtime, Social Assurance Allowances, Health Assurance Benefits, Health Assurance Deductions and Social Assurance Deductions. Contractor has been able to show proof of the mandatory 2023-2024 employment report to the Kotawaringin Barat Regency Manpower Office. 	
	 Contraktorr has been able to show proof of compensation payments for its contract employees at the end of each contract period. 	
	The company has been able to show sufficient evidence that all contractors have fulfilled their obligations to comply with relevant regulations, including those related to employment relations.	
2.2.3	All Contract Agreements mentioned in indicators 2.2.1 and 2.2.2 contain special clauses regarding the prohibition of child labor, forced labor and human trafficked labor.	Yes
	All contractors have already signed the ethical code, for example Bumdes Karya Mandala Makmur contract No. 012/SPK-SSS/I/2024 dated 02 January 2024 . The ethical code stating that no child laborers have worked up until now, there are no forced laborers / workers resulting from trafficking because all workers have	

Page **45** of **136**



	company has evalua .ada POM has a list of FF	icca con	iti actor perio	rmance	ance is met, the	
P n 2	is RSPO cert 2. PT Surya Sacertified. 3. PT Surya S	Sawit tified. awit Sej eberang th is RSF ni Bahagrya Tunit Perkasing geo	sers directly be July ral sources a Sejati (PT ati (PT SSS1) Seberang (PO non-certificial ggal Jaya sa locations, p	pased on the 2023 as follow: SSS1) Language (PT SSS2) area of of own proof of own	– June ada Estate which state hich is RSPO Arut and Kumai	Yes
tl la lo c	The company can collaboration with Methat the indirect FFE land. Based on this locations, where the coordinates of the represented by the coordinate data, ame Supplier Name Tani Bahagia Cooperative (832 members) Karya Tunggal Jaya Cooperative (603 members)	liddlema supplie , the co location cooper coordin	an FFB Suppers already homeony only of the Cooperative's officates of the	liers equip have legalith shows the perative is r e, while f	oed with evidence y on the managed coordinates for 3 represented by the or CV ISPs it is	Yes



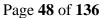


	CV Inti Sawit Perkasa (1 member) The company can a member farmers in (Certificate of Ownperson, as well as inot in the disputed a status. Based on the stated that all of the because all farmers Plasma land and all	the for ership) nformatherea or series results ne FFB who we	m of certification with an average on the lost ate land and the intervence of the intervence members	ates of land rage area ocation of t I forest are view with M d could be were farme	I rights they have of 2 hectares pe heir land which is under protection liddleman, he also verified as legalers who came from	
Principle 3: 0	ensured that they of stolen FFB and/or u	lid not a	accept FFB wered FFB.	rith unclear	sources, such as	5
Indicator	p a massian		nmary of Find			Compliance
3.1.1 (C)	PT Surya Sawit Seja 2024/2025 – 2027/2 material (seed), p estimation, revenue The management principles and policy and the results of intereviews, and the act a monthly basis. Ir with Plantation and all technical impler aimed at achieving monitoring, trainin management, busing annually, both the p extraction rate will response.					
	Unit management subjected to be char management through considering actual the changed in the fi	nged an gh mon rends a	d reviewed e thly manage	very month ment repo	by the respective rt meeting, which	
3.1.2	Based on the docu management, it can Lada Estate or Runt next 5 years based	be con u Estate	cluded that need Plantation U	o replantin Inits will be	g activities for the carried out in the	

Page **47** of **136**



	Estate	2030	2031	2032	2034	
	Lada	684.08 Ha	1,364.44 Ha	1,935.37 Ha	897.51 Ha	
242	Runtu			-		
3.1.3	The management for continuous consideration of opportunities of audits which a improvement in The compact Capture POME usage Decanter of FFB usage Shell produe Fiber produe	improvement the main so the unit of a more very aspect my has impleted from ffb. The control of	t, and it is social and er certification. Interest the conduction of the conduction	esticides with ogical pest consistency of the recommendation of Kotawa onitoring the and reported of the Entertain of the Ent	ed, based on I impacts and everal internal of continuous spects of: Methane Gas The the active control in this expects the use of es. The border areas extilizers and endations to ugh WWTP and reporting ringin Barat arough road ting to the cough testing vironment of cardous and Toxic Waste ment a zerond fiber as and regular	Yes
	• The use of	- CITC WADIC	racis and th	ic usc of te	ertilizers and	





	pesticides are in accordance with the recommendations to reduce the use of fossil fuels. Management Review Meeting Minutes document, RSPO Internal Audit in Estate and POM. The document includes PICs for implementation and monitoring, action plan implementation records, program time targets, and evidence of continuous improvement. To monitor and review economic, social and environmental performance, the company has carried out an RSPO internal audit which is carried out once a year by the Company's RSPO internal auditor team, including the RSPO PT SSS internal audit which was carried out on 12 February to 15 March 2024 with the results of 6 nonconformity findings at Lada estate, 7 nonconformity findings at Lada POM, and 4 nonconformity findings at Runtu estate then all nonconformities are closed with resolution through quick repairs, identification of the root of the problem and corrective action. This non-compliance was closed on April 2024. Apart from environmental aspects, the company has implemented a commitment to reduce environmental impacts for continuous improvement, including: management and monitoring of the quality of liquid waste, WWTP pools, B3 waste management, solid waste management, air quality testing and testing surface water quality (river water). The company has also continued its beneficial plant propagation activities according to targets per estate, conducting pest control cost analysis until the	
3.2.1 (C)	The company has prepared an annual report for the period 2023 as part of a continuous monitoring and improvement process using the RSPO PC Metrics Template version 2.1 where the data contained therein is verified to be in accordance with data in the field, and the report annual report has been submitted to the RSPO Secretariat. This annual report includes data entry about operational unit specific matters such as production area, FFB production, mill capacity, production and sales of CPO and Palm Kernel, supply base production: smallholders & outgrowers, demographics, training, operation input, LTI FR, and grievances. From the results of the auditor's verification of the contents of the matrix template, it is known that all data in general are in accordance with their respective periods, such as the total amount	Yes
3.2.2	of FFB, CPO, PK and others. The management unit has developed and implemented an action plan for continuous improvement, and it is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. Through several internal	Yes

Page **49** of **136**



audits which aim to monitor the consistency of continuous improvement in every aspect during 2023, including aspects of :

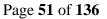
- The company has implemented Biogas Plant , Methane Gas Capture
- POME usage by estate
- Decanter cake usage by estate
- FFB usage by estate
- Shell produced from ffb process
- Fiber produced from ffb process
- EFB produced from ffb process
- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in company border areas that benefit the community.
- The use of renewable fuels and the use of fertilizers and pesticides are in accordance with the recommendations to reduce the use of fossil fuels.
- Waste management and monitoring through WWTP Management, testing the quality of the effluent and reporting it to the Environmental Agency of Kotawaringin Barat Regency.
- Air quality management and monitoring through road maintenance, air quality testing and reporting to the Pelalawan District Environmental Service.
- Management and monitoring of groundwater through testing ground water quality and reporting it to the Environment of Kotawaringin Barat Regency.
- Hazardous waste management through Hazardous and Toxic Waste Storage and Hazardous and Toxic Waste management and monitoring.
- Greenhouse Gas (GHG) Management. Implement a zeroburning policy, utilization of EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.
- The use of renewable fuels and the use of fertilizers and pesticides are in accordance with the recommendations to reduce the use of fossil fuels.

Management Review Meeting Minutes document, RSPO Internal Audit in Estate and POM. The document includes PICs for implementation

Page **50** of **136**

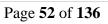


3 3 1 (C)	and monitoring, action plan implementation records, program time targets, and evidence of continuous improvement. To monitor and review economic, social and environmental performance, the company has carried out an RSPO internal audit which is carried out once a year by the Company's RSPO internal auditor team, including the RSPO PT SSS internal audit which was carried out on 12 February to 15 March 2024 with the results of 6 nonconformity findings at Lada estate, 7 nonconformity findings at Lada POM, and 4 nonconformity findings at Runtu estate then all nonconformities are closed with resolution through quick repairs, identification of the root of the problem and corrective action. This non-compliance was closed on April 2024. Apart from environmental aspects, the company has implemented a commitment to reduce environmental impacts for continuous improvement, including: management and monitoring of the quality of liquid waste, WWTP pools, B3 waste management, solid waste management, air quality testing and testing surface water quality (river water). The company has also continued its beneficial plant propagation activities according to targets per estate, conducting pest control cost analysis until the population is below the economic threshold.	Yes
3.3.1 (C)	There are the SOP for mill and plantation documented. The company already has an estates SOP that has been documented. The SOPs dated and approved by the management. The copy of the latest version of the SOP available on site and documented in an appropriate language. The SOPs made available at the appropriate location accessible by the workers. The evidence that SOPs are implemented and understood by workers: Based on field visits and interviews with spraying workers in block 9 Division 1 Lada Estate and harvesting block 53 Division 1 Lada Estate of PT SSS – Lada POM it is known that workers understand the procedures related to spraying activities such as not spraying near water bodies and not spraying downwind and harvesting activities block E10 Runtu Estate also on processing station In Lada POM, it is known that workers already know the procedures and criteria for harvesting and processing in Mill and have used PPE in accordance with the established HIRAC document.	Yes
3.3.2	The unit of certification was not able to demonstrate that its procedures related to Internal and External Grievance (No. SOP-HRD-07-R00) and Stakeholder Communications (No. SSS-01-HMS-15) are consistently implemented. At Lada Estate: Village heads of Desa Sumber Agung, Desa Sg Melawen, Desa Sg Rangit Jaya, Ladang Mandala Jaya, and school headmaster of SD 2	No RSPOPC/PTS SS/AA5- MIN-01





	Ladang Mandala Jaya were not aware of the available grievance procedure. Under paragraph 2.0 Consultation and Communication, all issues will be discussed in a consultative manner. This however has not been done effectively, resulting in the local communities not understanding the Company's grievance mechanism, and how to carry out discussions in a consultative manner. At Runtu Estate: A creche worker had verbally informed the mandore in charge approximately one month ago that the creche ceiling had sprung a leak. During audit interview, the mandore confirmed receipt of the complaint. However, as of the date of this audit, the mandore has yet to record this grievance in the Grievance Book. This is not in compliance with the Company's own Internal and External Grievance (No. SOP-HRD-07-R00) which states that all grievances including verbally given are to be recorded. Therefore, a Minor Non-Compliance was raised.	
3.3.3	Monitoring records and company actions have been documented from field inspection findings which are recorded in Corrective and Preventive Action documents. The action plan is reviewed during internal audits and quarterly Management Reviews, where the last Management Review was carried out on January 24 - 25 2024 which was attended by company management, in this case there are documented corrective actions and action plans found in the minutes of the company's management review.	Yes
	The company has carried out routine inspections and monitoring of activities in the plantation area. The results of internal control and monitoring activities are available and reviewed in the internal audit visits of agronomists which are carried out regularly, monitoring of the progress of action plans has been reported, and records of corrective actions, including monitoring recommendations and realization of fertilization, harvest area, FFB production and FFB quality, monthly HPT reports, attack and control, etc. An example of an Internal Audit Report for the Agronomic Estate Visit Bukit Pendulangan 1 (BP1), BP2 and BP3 was carried out in August 2023 with the results that there were findings of non-conformities, then all non-conformities were closed with resolution through quick repairs, identification of the root of the problem and corrective action.	
	The company has monitored and checked all applicable procedures, factory operational performance activities through regular visits to the factory area, where the report covers the main performance of the factory, overall assessment of factory operations, process efficiency, factory maintenance, management supervision, labor reports, production costs, EHS and sustainability management systems, then corrective action plans are established and followed up by the factory,	





where records are clear, available and well maintained. Example of RSPO PKS 5 Internal Audit Report conducted on 11 – 12 September 2023 with the results of 2 nonconformity findings, then all nonconformities were closed with resolution through quick repairs, identification of the root of the problem and corrective action. This non-compliance was closed on October 27 2023. The internal audit was carried out by Mr. Junior T Sianturi as auditor, and was approved by the Mill Head, and was acknowledged by the Plantation Head and Compliance & MS Div. Head. To ensure consistency of procedures implementation, the company has a monitoring inspection mechanism that was carried out regularly through internal audit activities. An internal audit conducted twice a year or if needed which the scope of the inspection includes estate and mill operational activities. There are several types of audits that are conducted routinely by the company. For example: RSPO Internal Audit Report for PT Surya Sawit Sejati Internal Audit date February 12 to 15 March 2024 non-conformity fulfilment on dated July 4, 2023. Mill Visit Report by the Chief Executive Director dated February 10, 2023 with results among others: FFB Reception Mill Water Tower Sterilizer Station Store **USB/PSFB** Mill Toilet Clarification Station **Press Station** - Kernel Plant **Boiler Station** Engine Room

Each unit has documented the operations of the estate and mill products such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.

The record of result of internal control and monitoring activities also record corrective action and improvement, this was provided in the management review meeting on indicator 3.1.3.

3.4.1 (C)

Environmental Impact Assessment

Demarcation Yellow Line.

 Lada POM dan Lada Estate. Dokumen Analisis Dampak Lingkungan (ANDAL) for PT Surya Sawit Sejati's Palm Oil Plantation and Processing Mill activities located in Sungai Rangit Yes

Page **53** of **136**



Jaya Village, Lada Mandala Jaya and Pangkalan Durin, Pangkalan Lada District, Kotawaringin Barat Regency through the Decree of the Kotawaringin Barat Regent No. 660/580/Bpdl-II.2/XII/2007 concerning Environmental Feasibility of Plantation and Palm Oil Processing Factory Development PT Surya Sawit Sejati was stipulated on December 1, 2007 with an area of 6,650 ha, factory capacity of 60 tons of FFB/hour.

- Runtu Estate. Dokumen Analisis Dampak Lingkungan (ANDAL) for PT Surya Sawit Sejati for Oil Palm Estate activity in Villages of Rangda, Sulung Kenambui, Runtu, and Sumpang, subdistirct of Arut Selatan, Kotawaringin Barat, KalimantanTengah Province. Approved bt Regional AMDAL assessing board of Kotawaringin Barat Regency No. 656/359/Bpdl-II.2/VII/2007 with total area 9.000 ha through the approval from government of Kotawaringin Barat Regency, Regional Environmental Impact Controlling Agency No. 660/359/Bpdl-II.2/VII/2007 dated July, 27 2007.
- Biogas Instalation Environmental Permit for Biogas Installation of PT Surya Sawit Sejati in Sungai Rangit Jaya Village, Pangkalan Lada District, Kotawaringin Barat Regency through the Decree of the Kotawaringin Barat Regent No. 660/15/BLH/XII/2012 dated December 12, 2012.

The HCV Assessment conducted in 9 May 2014, made by the biodiversity internal team, created a work program to complete the results of the HCV identification in 2008, by delineating the HCV area, a baseline study and also conducting liability disclosures to the RSPO regarding the program for remediation and compensation, with total area managed is 2,587.66 ha from Lada and Runtu Estate. All operational area and activity have been covered in environmental

Social Impact Assessment

impact assessment document.

The company has conducted and published a Social Impact Assessment (SIA) report for PT Surya Sawit Sejati, prepared by PT Legal Suksesi Indonesia Consultant in 2024.

The assessment was conducted using principles of participation, multi-stakeholder engagement, appreciative inquiry, and the social learning cycle. The methods employed in the assessment included a literature review, field observations, in-depth interviews, triangulation, and the social learning cycle. The study focused on communities residing in several villages, including Pangkalan Durin, Sungai Rangit Jaya, Lada Mandala Jaya, Sungai Melawen, Pangkalan Dewa, Pandu Sanjaya, Runtu, Kenambui, and Umpang.

Yes

Page **54** of **136**



The SIA identifies both positive and negative impacts, encompassing various potential factors, such as local employment opportunities, economic livelihoods and working conditions, the acquisition of new knowledge and skills by independent smallholders (positive), and issues related to community social responsibility (negative). Local employment opportunities are managed by prioritizing local workers based on the company's workforce needs, enhancing the quality of human resources through education and training for potential local employees in alignment with the company's qualification standards, and facilitating cooperation between the company and local contractors for specific jobs that meet the company's requirements. Economic livelihoods and working conditions are managed by providing training to the community on agricultural intensification and mechanization, as well as implementing an integrated system of agricultural and livestock businesses to increase community income. Community social responsibility issues are addressed by collecting data on the primary needs of the surrounding community to ensure that more people benefit from the company's presence, and by creating detailed short-, medium-, and long-term CSR plans for each neighboring village 3.4.2 **Environmental Impact Assessment** Yes The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester and reported to related agency (explain in indicator 3.4.2). The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the critical impacts recommended in Environmental permits. Include impact analysis by trend evaluation, critical level evaluation and compliance evaluation. From the documents review related to environmental monitoring in the RKL-RPL document for the 2nd semester of 2024. The certification unit has managed each of these parameters. Even though, the unit of certification has made several efforts to maintain its quality, such Preventing soil, water, and air pollution by reducing the use of chemicals, managing waste properly, and complying with proper waste disposal in each area.

Page **55** of **136**



Undertake efforts to manage gas waste by utilizing it as biogas.

	 Carry out efforts to save the environment by protecting areas important for environmental sustainability, such as river borders. Manage and monitor the impact of potential for land fires. Manage and monitor the quality of soil, air, water, and other disturbances. Utilizing solid waste from palm oil mills as a substitute for fertilizers and fossil fuels. In managing HCV, PT SSS has a program as an action point of the remediation and compensation program collaborating with BKSDA of Kalimantan Tengah Province, KPHP Kotawaringin Barat, and OFUK-Indonesia, concern in Orangutan research and conservation. In its implementation, this program aims to managing forest corridor that connect between conservation area PT.SSS and Tanjung Puting National Park as wildlife habitat. 	
	Social Impact Assessment The Social Impact Assessment described in the previous indicator included a management and monitoring plan of social impacts that will be managed and monitored, such as local employment opportunities, economic livelihoods and working conditions, the acquisition of new knowledge and skills by independent smallholders (positive), and issues related to community social responsibility (negative).	Yes
	Based on the document review, the assessment involved the participation of affected stakeholders, including public figures, women's groups, village heads, cooperative leaders, paramedics, workers, and others from the villages of Pangkalan Durin, Sungai Rangit Jaya, Lada Mandala Jaya, Sungai Melawen, Pangkalan Dewa, Pandu Sanjaya, Runtu, Kenambui, and Umpang. This has been confirmed by community representatives interviewed during the audit.	
	A cross-examination of the management plan documents, and their implementation evidence has been conducted. For instance, regarding the impact on local employment opportunities, its implementation is recorded in the Master List of Employees for July 2024, which shows that over 60% of the plantation's operational workforce is composed of local residents from the village and district levels. Community social responsibility issues have also been effectively managed, as documented in the 2024 CSR Report (see indocator 4.3.1 below).	
3.4.3 (C)	Environmental Impact Assessment The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester and	Yes





reported to related agency (explain in indicator 3.4.2). The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the critical impacts recommended in Environmental permits. Include impact analysis by trend evaluation, critical level evaluation and compliance evaluation.

From the documents review related to environmental monitoring in the RKL-RPL document for the 2nd semester of 2024. The certification unit has managed each of these parameters. Even though, the unit of certification has made several efforts to maintain its quality, such as:

- Preventing soil, water, and air pollution by reducing the use of chemicals, managing waste properly, and complying with proper waste disposal in each area.
- Undertake efforts to manage gas waste by utilizing it as biogas.
- Carry out efforts to save the environment by protecting areas important for environmental sustainability, such as river borders.
- Manage and monitor the impact of potential for land fires.
- Manage and monitor the quality of soil, air, water, and other disturbances.
- Utilizing solid waste from palm oil mills as a substitute for fertilizers and fossil fuels.

In managing HCV, PT SSS has a program as an action point of the remediation and compensation program collaborating with BKSDA of Kalimantan Tengah Province, KPHP Kotawaringin Barat, and OFUK-Indonesia, concern in Orangutan research and conservation. In its implementation, this program aims to managing forest corridor that connect between conservation area PT.SSS and Tanjung Puting National Park as wildlife habitat.

Social Impact Assessment

The company has conducted and published a Social Impact Assessment (SIA) report for PT Surya Sawit Sejati, prepared by PT Legal Suksesi Indonesia Consultant in 2024, and does not yet require a review.

The document has been supplemented with management and monitoring plan of social impacts that will be managed and monitored, such as local employment opportunities, economic livelihoods and working conditions, the acquisition of new knowledge and skills by Yes

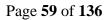
Page **57** of **136**



	independent smallholders (positive), and issues related to community social responsibility (negative).	
3.5.1	The company already has procedures related to employment, which we have verified during the audit, namely the procedure of <i>Rekruitmen Karyawan</i> No. SOP-HRD-REV-02-R00, dated June 10, 2023, procedure of <i>Rekruitmen Karyawan</i> PKWT No. SOP-HRD-REV-03-R00, June 10, 2023, procedure of <i>Proses Promosi Karyawan</i> No. SSS-HRD-24-R00, June 1, 2023, procedure of <i>Proses Mutasi Karyawan</i> No. SSS-HRD-REV-01-2023, June 1, 2023, procedure of <i>Proses Pensiun Karyawan</i> No. SSS-HRD-22-R00, June 1, 2023, procedure of <i>Proses Pemutusan Hubungan Kerja Karyawan</i> No. SSS-HRD-23-R00, June 1, 2023. All procedures are signed by the President Director.	Yes
	The aforementioned procedures are further detailed in the Collective Labour Agreement, such as the Performance Evaluation, which is conducted in stages and serves as the basis for promotions in grade, rank, position, and salary adjustments. In addition, the CLA also provides an explanation of New Worker Acceptance, Probational period, Appointment of permanent workers, Assessment of work performance, Promotion, Termination of employment due to retirement, Termination of Employment due to serious mistakes, and others. (PKWT).	
	The procedure and CLA in Bahasa Indonesia. Procedure available to the workers and the union as their representatives, meanwhile, the CLA is distributed to all employees. The company employs two types of labor: permanent workers and contract workers.	
3.5.2	The employment procedures described in the previous indicators have been implemented by the company and have been verified during the audit. Evidence of this implementation includes documents such as Decree No. 001/SSS/HRD-Prom/I/2024 related to employee promotion, ES, who was previously a harvesting, has been promoted to checker in the Lada Estate Division II.	Yes
	Additionally, there is also the document of Decree No. 026/SSS/HRD-MUT/VII/2024 regarding the transfer of an employee named MAM, who was transferred from Runtu Estate to Kumai Estate with the same position as a security officer.	
	The implementation of the employee retirement procedure is recorded in the Joint Agreement document No. 017/KSB/UP-PT.SSS/II/2024, which outlines the mutual agreement between the employee and the company to terminate the employment relationship.	



3.6.1 (C)	The OHS policy is contained in the OSH Policy which was signed by Top Management on October 01, 2022. Unit certification showing SOP for Preparation of Hazard Identification and Risk Assessment Number SSS-SUS-013 dated 15 May 2022. The SOP describes hazard identification, environmental impact analysis and all activities/activities/work, work processes, methods/work methods, place/location work, work equipment and materials/materials by using the Hazard Identification Form, Environmental Impact Analysis and OHS Risk Assessment and considering things such as routine activities, normal, abnormal, and emergency conditions. Preparation of Hazard Identification, Environmental Impact Analysis and OHS Risk Assessment is made before work is carried out in all sections/departments and must be reviewed (evaluated and corrected) at least once every 2 years. a. Risk assessments are carried out for all company operations, processes and activities where health and safety is an issue. b. Documented mitigation plans for the problems identified in the risk assessment have been demonstrated e.g. pesticide reduction, fire control, reduction in the number of occupational accidents. All potential hazards have been analysed in the HIRARC document. c. The mitigation plan above has been implemented, monitored and reported in the P2K3 report and sent to the relevant Manpower Office. d. Risk assessments have been reviewed annually and when accidents occur to prevent recurrence e. A record of work accidents has been shown. f. Precautions attached to products such as MSDS have been equipped for every agricultural chemical product. g. Based on field visits to Lada Esttate and Runtu Estate for activity of harvesting, spraying, fertilizer and processing work in POM, it can be seen that workers are aware of the risks of danger in their respective workplaces. The company shows the OHS program that has been implemented and discusses the results and evaluates them at the monthly P2K3	Yes
3.6.2 (C)	meeting. The company can show evidence that it has carried out monitoring of	Yes
3.0.2 (C)	The company can show evidence that it has carried out monitoring of the effectiveness of OHS to handle OHS risks in people including the following: The company can show records of OHS Committee meetings of all Estate and Mill units which are held once a month (more	165





	 explanations in indicator 6.7.1). Medical Check Up (more explanations in indicator 7.2.10). The company shows records of monitoring the condition of facilities and infrastructure for dealing with estate and mill emergencies. The company shows records of inspections of conditions and compliance with the use of PPE. Identification of areas with potential emergency hazards such as areas prone to fire, explosion, land / water pollution, and workplace accidents and the results of monitoring conducted every month. 	
	OHS committee meetings have been held regularly every month with discussions of OHS issues and their follow-ups, for example the OHS committee meeting on June 26, 2024 with discussions including the OHS committee Management Work Program Plan from July 2024 and Work Accidents.	
3.7.1 (C)	The company has the Training Program for workers in the mill and estates in 2024, cover all operational and RSPO aspects and cover all parties who need training such as staff, workers, and contractors.	Yes
	The training programs include SOP and pesticide training, manuring training, IPM training, hazardous waste management training, first aid training, mill waste management training, conservation training, PAA operator re-training, fire fighting training, fire drill, water management training, etc.	
	Based on review of the training programs document above, detail the number of staff and workers, and contract workers who need training, and training times have been listed in it. Training is conducted internally and externally as needed.	
	HRD and coordinator of P3K3 are responsible for developing training programs, scheduling and implementing. Every unit is permitted to submit their training needs, and the HRD and P2K3 coordinator is slotted into the available time frame. The training programs plan is accessible to staff and workers upon request.	
	Some of the training plans have been realized and recorded in minutes of training which is well-maintaned and complete with an attendance list and photo documentation.	
	Based on an interview with staff, workers, and contractor who became a training participant, confirmed they can understand the training that was followed and practicing in the field.	

Page **60** of **136**

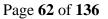


3.7.2	The company has properly documented every training activity. Minutes of training which is well-maintaned and complete with training material, attendance list and photo documentation, and accessible to staff and workers upon request. The following is an example of training documentation that has been	Yes
	 carried out during 2024 e.g.: Training operational skid steer loader caterpillar by PT Trakindo Utama, January 30, 2024. Training SOP & Hirarc FFB Reception, February 12, 2024. Supply Chain training, March 23, 2024. Certification training for lifting and transport equipment operators, specifically wheel loader operators, April 25-28, 2024 Training SOP & Hirarc station grading, May 20, 2024. Training SOP & Hirarc boiler, June 10, 2024. Certification training for power and production machinery, July 08-11, 2024. Based on interviews with the Union and workers in the mill and estate, it was noted that the company had provided training for workers in Bahasa Indonesia, which was well understood by them. Interviews with contractor workers who participated in the training confirmed that they were able to explain the training they had 	
	received, such as SOP FFB reception implementation. Based on interviews in Lada POM note that the weighbridge operators, Security and loading ramp understand the supply chain management system. It also known that training and refreshment (awareness) of supply chain management system were carried out annually. The last SCCS training was held on 23 March 2024 for POM workers and Contractor attented by 17 participants, also at Estate was held on 20 August 2024 attended by 16 participant. Based on interviews with weighbridge operators, sorting and laboratory officer, confirmed that they understand the supply chain process. The company assigned a person with full responsibility and authority over implementing Supply Chain Certification Standard (SCCS) i.e. the Mill Manager and his team.	Yes
	Requirements for Mills	
Identity Preserv		
3.8.1	The Lada POM plans to use supply chain module Mass Balance (MB) as it is still receiving FFB from certified and uncertified sources. The implementation of this module will be verified further at annual surveillance audit.	NA
Mass Balance M	odule	

Page **61** of **136**



3.8.2	The Lada POM plans to use supply chain module Mass Balance (MB) as it is still receiving FFB from certified and uncertified sources. The implementation of this module will be verified further at annual surveillance audit.				Yes
3.8.3	Estimated certified product recorded in the last assessment report and certificate, as well as in the RSPO IT Platform. Actual certified produced has been verified during this assessment and found reasonable. The estimates of certified production for the next license period also have been set, in reasonable amount considering the last year's production. The data are shown in the following table:				Yes
		Projected from last audit (July 2023 – June 2024)	Actual Processed for 12 Months [July 2023 – June 2024]	Projected Production for next 12 Months [July 2024 – June 2025]	
	FFB Summary (MT)	90.000	81,202.82	85,000	
	CSPO Summary (MT)	18,000	17,817.64	18,000	
	CSPK Summary (MT)	4,500	3,966.02	4,000	
3.8.4	information as Member na Commodity License Per Account UI Core produ Member ID Member ca GPS Coordi Visiting add Str Citt Sta Country: In	me: PT Surya Sawi :: Palm Oil :iod 04 March 2024 D: RSPO_AC100004 ct: Palm Oil :: RSPO_PO1000004 tegory: Oil Mill nates: 111.772559, dress: eet: Ds. Pangkalan y: Kotawaringin Bar ide: Central Kaliman idonesia	t Sejati (Lada Pa – 26 November 1019 1083 -2.590899 Durin, Kecamata at	alm Oil Mill) 2024) an Pangkalan Lada.	Yes
Documented Pro	ocedures				





3.8.5 Lada mill has had supply chain procedure through the document Module E – CPO Mills: Mass Balance that approved and signed by President Director of PT. Surya Sawit Sejati 4th Revision on 2 January 2022. This procedure described the rules as follows:

Yes

- Definition of Module E Mass Balance
- Objective
- Standard
- Planning:
 - Separation of certified and noncertified product.
 - Demarcation of field which certified (HGU) or noncertified (Non HGU) by yellow paint.
 - Harvesting process, loading and transporting FFB (from certified or noncertified field) the certified stamp (Certified Sustainable FFB – MUTU-RSPO/123). If the majority of FFB is noncertified at one field, they will be downgrade as noncertified.
 - FFB receiving in mill (if the certified and non-certified FFB send on the one truck, the mass balance will be percentage by the bunch's, all FFB consignment from third parties will be stamp as Uncertified FFB.
 - FFB processing in mill.
 - Sales and dispatch
 - Record keeping (the mill will be recording all FFB received, CPO & PK dispatch regarding to real time basis).
 - Continuous improvement

The company has documented procedure for internal audit to determine whether the company:

- Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.
- Effectively implements and maintains the standard requirements within its organization.
- Internal audit carries out minimum one times a year.

Internal audit of RSPO SCCS conducted on 27 November 2023. All SCCS indicators has been assessed and complied. Management Review of RSPO SCCS implementation conducted on 6 December 2023. The management review discussion has covered the input from internal audit result, correction and corrective action, customer feedback, process Performa and product compliance, follow up of previous management review, and recommendation for improvement.

Based on interviews in Lada POM note that the weighbridge

G

operators, Security and loading ramp understand the supply chain management system. It also known that training and refreshment (awareness) of supply chain management system were carried out annually. The last SCCS training was held on 23 March 2024 for POM workers and Contractor attented by 17 participants , also at Estate was held ion 20 August 2024 attended by 16 participant.

Based on the results of interviews with Harvesting foreman Block 53 Division I Lada estate, the officer can demonstrate how to record FFB originating from certified and non-certified areas and they admit that they have been trained in SCCS.

Internal Audit

3.8.6

Procedure to conduct internal audit for SCCS implementation has been defined by the mill, namely SOP of Internal Audit, which mentioned that internal audit shall be conducted annually to implement and maintain the respective standard requirements effectively, and including the SCCS standard in key station involved (purchasing FFB, processing, sales storage, delivery and shipping of certified product). The latest internal audit was carried out in 2 June and 10 June 2023 and based result of internal audit there is no non conformity related the requirements of SCCS

The company has carried out an RSPO internal audit which is carried out once a year by the Company's RSPO internal auditor team, including the RSPO PT SSS internal audit which was carried out on 12 February to 15 March 2024 with the results of 6 nonconformity findings at Lada estate, 7 nonconformity findings at Lada POM, and 4 nonconformity findings at Runtu estate then all non-conformities are closed with resolution through quick repairs, identification of the root of the problem and corrective action. This non-compliance was closed on April 2024. Apart from environmental aspects, the company has implemented a commitment to reduce environmental impacts for continuous improvement, including: management and monitoring of the quality of liquid waste, WWTP pools, B3 waste management, solid waste management, air quality testing and testing surface water quality (river water). The company has also continued its beneficial plant propagation activities according to targets per estate, conducting pest control cost analysis until the population is below the economic threshold.

The management review discussion has covered the input from internal audit result, correction and corrective action, customer feedback, process Performa and product compliance, follow up of previous management review, and recommendation for improvement where , the last Management Review was carried out on January 24

Yes

Page 64 of 136



- 25 2024 which was attended by company management, in this case there are documented corrective actions and action plans found in the minutes of the company's management review. **Purchasing Goods** 3.8.7 The mill has verified and documented the volumes of certified and Yes non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is July 2023 – June 2024: Estate FFB (MT) Lada Estate 72,00 Runtu Estate 18,000 90,000 Total Actual certified produced has been verified during this assessment. The estimates of certified production for the next license period also have been set, in reasonable amount considering the last year's production. The data are shown in the following table: Projected from Actual **Projected** last audit Processed **Production for** (July 2023 for 12 next 12 June 2024) Months **Months** [July 2023 -[July 2024 -June 2024] June 2025] 85,000 90.000 81,202.82 **FFB Summary** (MT) **CSPO** 18,000 Summary 17,817.64 18,000 (MT) CSPK 3,966.02 4,000 Summary 4,500 (MT) Reffer to the file Mass Balance CSPK RSPO, regarding document of "Laporan Balancing CPK RSPO and the file Mass Balance CSPO RSPO regarding document "Laporan Balancing CSPO RSPO, show that the mill conducted verification related incoming certified FFB day by day, recapitulated into month and consolidated per 3 months. The incoming certified FFB has been recorded starting from July, 01 2023 to June, 31 2024. From the document, the total certified FFB processed with MB supply chain model during this periode was

Page **65** of **136**

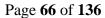


81,202.82 Ton, while the certified FFB listed was 90,000 Ton,

therefore there is no over-production.

Sales and Goods Out

		,,
3.8.8	Documentation for the Sustainable Certified Product (CSPO and CSPK), consist of daily record of the FFB acceptance, daily record of certified production, which classified as the CSPO and CSPK, certified sales record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. The mill has product information provided in such as document of contract agreement, delivery order, delivery ticket, report of loading, weighbridge ticket and other invoices for CSPO/CSPK. Documents verification and interview during an audit it was known the claimed RSPO product of (CSPO & CSPK) is no longer than 3 months since the product delivered. the supplying mill has been ensuring that the following minimum information for RSPO certified products is made available and traced, its evidenced with several supporting documents as follows delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name, and address of the seller, for example: Shipping announcement with transaction id TR-4159737d-4a1e volume of CSPK 299,58 MT, the module of SCCS MB, dated 14 June 2024, the mill can present evidence of delivery of CSPO from PT SSS POM to PT. SAMRT TbK, based on B/018/PK/ED-PT.SSS/VI/2024, 14 June 2024, announced date 25 June 2024 Shipping announcement with transaction id TR-17ee3a11-1984 volume of CSPK 299,74 MT, the module of SCCS MB, dated 13 March 2024 , the mill can present evidence of delivery of CSPO from PT SSS POM to PT. Sember Indah Perkasa, based on B 007/PK/ED-PT.SSS/III/2024, 14 June 2024, announced date 16	Yes
Outsourcing Act	March 2024	
		V.
3.8.9	 The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Only transportation of certified products CPO is outsourced to the third parties and the company has its listed very well, as shows through several Work Agreement as follows: Agreement with CPO Transporter of PT Berkat Karya Borneo Lestari No. 032.A/SPK-CPO/SSS-PTBK/I/2024 dated 02 January 2024, valid thru 31 December 2024. To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the 	Yes
	contractor to comply with the supply chain rules. For instance, the responsibility to deliver products only from Lada POM as well as the willingness to observe by Certification Body and the company internal audit in order to verify the compliance. Based on the results of interviews with the transporter, it is known that the transporter's	





	understanding regarding the CB's ability to carry out audits related to operations, systems and all information related to him is well known. The transporter is also willing to be audited/evaluated separately within the agreed timeframe.	
3.8.10	The company has a contact detail of contractors to handling of certified product. The last update in August 2024: - Suparno , Director of PT Berkat Karya Borneo Lestari addres Jalan A.Yani Km 17, RT 11, Desa Bumi Harjo Kecamatan Kumai – Kabupaten Kotawaringin Barat	Yes
3.8.11	In the period from July 2023 to June 2024, there were no additional new CPO/PK transporters in collaboration with the company. So that at the time of the audit there were only 1 transporters CPO , namely PT Berkat Karya Borneo Lestari .	Yes
Record Keeping		
3.8.12	The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to date. All the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. Based on document verification on supply chain procedure, retention time for all records and report regarding to supply chain are kept for 7 years. To the auditors the company can show all the required documents covering all aspects of this RSPO Supply Chain Certification Standard requirements such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. Based on document review known that the mill still kept. The mill has records of FFB input and the products produce and sold by the mill stated in mass balance report.	Yes
Extraction Rate		
3.8.13	The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 12-month period for July 2023 to June 2024 i.e OER 20.85% and KER 4.71%. Periodically update of extraction is actual extraction.	Yes
3.8.14	The mill conduct review the conversion ratio by sounding of extraction rate of CPO and PK Day by day.	Yes
Processing		
3.8.15	SCSS module used Lada POM is MB, because the mill receives FFB from source that certified and non-certified RSPO.	N/A
Registration of 1	Fransactions	
3.8.16	Documentation for the Sustainable Certified Product (CSPO and CSPK), consist of daily record of the FFB acceptance, daily record of certified production, which classified as the CSPO and CSPK, certified	Yes

Page **67** of **136**



	sales record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Based on documents verifications and interview with management units obtained information if in last 12 months before audit July 2023 to June 2024) for CSPO it was known there is 0.00 MT sold as RSPO certified product and CSPK there are 3,600 MT sold as RSPO certified product and there are product that has been sold as conventional for CSPO as 7,656MT and CSPK as 574.74 MT.	
	 Documents verification and interview during an audit it was known the claimed RSPO product of (CSPO & CSPK) is no longer than 3 months since the product delivered, for example: Shipping announcement with transaction id TR-4159737d-4a1e volume of CSPK 299,58 MT, the module of SCCS MB, dated 14 June 2024, the mill can present evidence of delivery of CSPO from PT SSS POM to PT. SAMRT TbK, based on B/018/PK/ED-PT.SSS/VI/2024, 14 June 2024, announced date 25 June 2024 Shipping announcement with transaction id TR-17ee3a11-1984 volume of CSPK 299,74 MT, the module of SCCS MB, dated 13 March 2024, the mill can present evidence of delivery of CSPO from PT SSS POM to PT. Sember Indah Perkasa, based on B 007/PK/ED-PT.SSS/III/2024, 14 June 2024, announced date 16 March 2024 	
Claims		
3.8.17	Based on announcement and transaction report documents review, it concluded that all RSPO certified products submitted are in compliance with the RSPO Rules on Market Communications and Claims. Based on management representative interview and document review, the mill does not use trademark on its sales activities and communication.	Yes
Principle 4: R	espect community and human rights and deliver benefits	
Indicator	Summary of Findings	Compliance (Y/N) and NC#
4.1.1 (C)	A Policy to respect human rights and prohibition of retaliation against Human Rights Defenders is available and documented under the Company's Human Rights Policy dated 1/10/2022 signed by the President Director. This Policy was communicated to all its stakeholders internal and external during the stakeholder meeting held on 26/7/2023. The Policy also states the Company's commitment to protect and advance human rights including prohibiting retaliation, intimidation and harassment against Human Rights Defenders (HRD), whistleblowers, complainants and community spokespersons.	Yes

Page **68** of **136**



	The Policy was also sosialised to various levels of workforce on 9/7/2024, and 23/7/2024.	
	The essence of the Policy is also incorporated in all agreements signed. Sampled during the audit were the following agreements:	
	A) Agreement No. 003/SPK/ED-PT.SSS/II/2024 signed between PT Surya Sawit Sejati & CV Hastina Graha Mandiri dated 12/2/2024 for installation of septic tank at the housing area.	
	B) Contract with PT Surya Sawit Sejati and CV Ama Persada valid from 1/1/2024 – 31/12/2024 for Runtu Estate.	
	Based on interview of estate, mill workers and village heads from the surrounding areas, evidence was available that they are aware on this Policy.	
4.1.2	Based on interviews with village heads, teachers, employees and by field observations, there was no evidence that the Company is instigating violence or use any form of harassment in its operations	Yes
	Based on online research during the audit, there is no media reported relating complaint with human right issues.	
	Based on internal and eksternal complaints and grievances records, no records found regarding this issue.	
4.2.1 (C)	A mutually agreed system that is open to all affected parties (either internal or external) to resolve disputes in an effective and timely manner is available under SOP-HRD-07-R02 dated 1/1/2015 (Revised on 14/12/2020). The procedure specifies the timeframe required for the grievances to be addressed. For internal stakeholders, the grievances can be reported to the immediate superior. If after 14 days the grievance is still not resolved, the complainant can escalate the matter to Human Resources Department at the Headquarters. Upon resolution, the complainant will be informed of the status. If after 10 days of complaint to HR Department remains unresolved, the complainant or the Company can refer the matter to a bipartite team for resolution. If this too cannot be resolved, parties can bring the matter before a tripartite panel, or to the Courts for a legal ruling.	Yes
	SOP-HRD-07-R02 dated 1/1/2015 (Revised on 14/12/2020) acknowledges that complainant's identity can be protected, where requested.	
	Sighted were grievances received from workers dated 28/6/2024 and 20/7/2024 related to house repairs. The grievances were resolved on 28/6/2024 and 29/6/2024, respectively.	

Page **69** of **136**

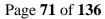


4.2.2	The procedure to ensure the system is understood by affected parties including by illiterate parties exists under Clause 2(a) of SOP-HRD-07-R02 dated 1/1/2015 (Revised on 14/12/2020). The SOP was briefed to affected parties during internal and external stakeholder meeting held on 23/6/2023. Interviews held with the local communities also confirmed that any briefing given, are usually done verbally and face to face as per the SOP.	Yes
4.2.3	Based on the complaints lodged by workers in the Grievance Book (which mainly cover house repairs), evidence was available that complainants are kept aware of the progress, which they acknowledge on the complaints form.	Yes
4.2.4	Under conflict resolution SOP No. SSS-01-HMS-15 dated 1/1/2015, the conflict resolution mechanism allows for parties to seek consultation from 3rd party mediators or arbitration.	Yes
	One case which used the mediation process is the alleged land dispute involving 9 ex-plasma Lada who claimed that their land sits within the Company's HGU. This matter was sent for mediation before the Kepala Kantor Pertahanan ATR/BPN Kabupaten Kotawaringin Barat in Pangkalan Bun on 16/8/2023. The outcome was that the documents that the land claimants were supposed to give to prove their claim could not be produced.	
4.3.1	The Company's CSR are based on five main pillars, health, education, religious and infrastructure. All CSR activities will also be prioritized based on affordability and values.	Yes
	Based on proposals received from the local communities and schools, evidence was available that contributions made to the communities were based on the results of consultations.	
	Among those include job opportunities for the local communities, repair of 800m side road that links the Lada Estate to Desa Sg Rangit. This was done based on proposal from the village head dated 11/12/2023. Meeting document showed that the work was completed on 29/6/2024.	
	In addition, evidence was also available of local communities' requests for POME to be turned into animal feed, as evidenced by the company's letter dated 3/2/2024 informing that the POME solids are ready to be collected.	
4.4.1 (C)	Documents showing legal ownership or lease and history of land tenure and the actual legal or customary use of the land are available. They are as follows:	Yes
	a. In 2005:	

Page **70** of **136**

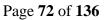


	Izin Usaha Perkebunan (IUP) via Decree of Bupati, Kotawaringin Barat dated 7/2/2005 (Ref: No. Ekbang/525.26/48/II/2005)Location: Desa Sungai Rangit Jaya and Desa Lada Mandala Jaya, Kecamatan Pangkalan Lada, Kabupaten Kotawaringin Barat, Kalimantan Tengah for a plantation area of 2,650 ha. b. In 2005: Via HGU No. 81/HGU/BPN/2005 dated 4/7/2005 for an area of 2.508,472 ha. c. In 2006: IUP issued to PT Surya Sawit Sejati, via Decree of Bupati Kotawaringin Barat No. EKBANG/525.26/597/XII/2006 dated 30/12/2006. Location: Desa Sungai Rangit Jaya and Desa Lada Mandala Jaya, Kecamatan Pangkalan Lada, Kabupaten Kotawaringin Barat, Kalimantan Tengah for an area of 4.000 ha. d. In 2006: IUP for PT Surya Sawit Sejati via the Decree of Bupati Kotawaringin Barat No. EKBANG/525.26/598/XII/2006 dated 30/12/2006. Location: Desa Runtu and Desa Umpang, Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat, Kalimantan Tengah for a plantation	
	e. In 2010: IUP-Pengolahan (IUP-P) issued to PT Surya Sawit Sejati, via Decree of Bupati Kotawaringin Barat No. Ekbang/525.26/102/EK/2010, dated 28/4/2020. Location: Kecamatan Pangkalan Lada dan Arut Selatan, Desa Sungai Rangit Jaya, Desa Umpang, dan Desa Suayap, Kabupaten Kotawaringin Barat, Kalimantan Tengah for an area of 15,650 ha. f. In 2016: Via Decree HGB No. 01/HGB/BPN/62.01.2016 dated 30/6/2016 with an area of 1,651 ha. g. In 2018: Via Decree HGU No. 1/HGU/KEM-ATR/BPN/2018 dated 2/1/2018 for an area of 6,004.15 ha.	
4.4.2	Copies of negotiated agreements with affected parties are available. These documents show that it has been agreed upon in consultation in good faith with all relevant parties. Based on interviews with the local communities from Desa Sumber Agung, Desa Sg Rangit Jaya,	Yes





	Desa Lada Mandala Jaya, and Desa Umpang, they confirmed that the	
	affected local communities had entered into the agreements freely	
	and without any coercion. It was also confirmed that the parties were	
	briefed of their rights to refuse consent, should they wish. Among the	
	documents sighted were records of compensation as follows:	
	- Compensation paid on 21/7/2021 to 23 community members	
	represented by their representative MA for 46.13 ha (Lada Estate)	
	- Compensation paid on 15/5/2018 to MM for 10.22 ha (Runtu Estate)	
	- Compensation paid on 18/5/2018 to EK for 0.75 ha (Lada Estate)	
	- Compensation paid on 27/4/2018 to CH for 0.58 ha (Lada Estate)	
4.4.3 (C)	The land used by the Company sits on state land. For those that were	Yes
	previously owned by the community, have been duly compensated	
	for. Documents showing land compensation document also contains	
	maps of the areas compensated. The boundaries have been identified	
	via participative mapping where the communities were involved.	
4.4.4	The land used by the Company sits on state land. For those that were	Yes
	previously owned by the community, have been duly compensated	
	for. Documents showing land compensation document also contains	
	maps of the areas compensated. The agreements and compensation	
4.4.5.(6)	documents were all prepared in Bahasa Indonesia.	Vaa
4.4.5 (C)	There was no document to show that the community was represented	Yes
	by any institutions. Or legal counsel. However, base don interviews with the local communities, they confirmed that the negotiations were	
	mutually agreed and they were aware of their rights, and did not need	
	third party representatives.	
4.4.6	As confirmed by the village heads of Desa Sumber Agung, Desa Sg	Yes
	Rangit Jaya, Desa Lada Mandala Jaya, Desa Umpang and Desa Sg	100
	Melawen, the negotiated agreements have been implemented and	
	there is currently no land dispute between the Company and the local	
	communities.	
4.5.1 (C)	No new planting is established. Therefore indicators under chapter	NA
	4.5 is not applicable.	
4.5.2 (C)	NA	NA
4.5.3	NA	NA
4.5.4	NA NA	NA
4.5.5	NA NA	NA
4.5.6	NA NA	NA NA
4.5.7	NA NA	NA NA
4.5.8 (C)	NA	NA
4.6.1 (C)	A mutually procedure for identifying legal, customary or user rights	Yes
	and for identifying people entitled to compensation is available under	
	Procedure SSS-COMDEV(HMS)-024 dated 1/4/2014 revised on 01-13	
462(C)	September 2016. A mutually procedure for identifying legal, customary or user rights	Yes
4.6.2 (C)	and for identifying people entitled to compensation is available under	res
	and for identifying people enduced to compensation is available under	



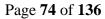


	Procedure SSS-COMDEV(HMS)-024 dated 1/4/2014 revised on 01-13 September 2016. The implementation of this procedure was verified by the village heads of Desa Sumber Agung, Desa Sg Rangit Jaya, Desa Lada Mandala Jaya, Desa Umpang and Desa Sg Melawen. This was further evidenced by the records of compensation as follows: - Compensation paid on 21/7/2021 to 23 community members represented by their representative MA for 46.13 ha (Lada Estate) - Compensation paid on 15/5/2018 to MM for 10.22 ha (Runtu Estate) - Compensation paid on 27/4/2018 to EK for 0.75 ha (Lada Estate) - Compensation paid on 27/4/2018 to CH for 0.58 ha (Lada Estate).	
4.6.3	Based on the documents reviewed, namely the list dated 31/5/2023 of landowners willing to set aside the profits from FFB sale for replanting, there were at least four women holding land titles to smallholdings in Desa Sg Rangit Jaya, Desa Sumber Agung and Desa Lada Mandala Jaya. Each of them holds between 0.75 ha to 2 ha each.	Yes
4.6.4	The process and outcomes of negotiated agreements and records of compensation payments were made available to each recipient. Sampled during the audit were the payment records and agreement for compensation for the following: - MOU with Desa Pangkalan Durin for 16.40 ha - MOU with Desa Sg Melawen for 28.75 ha In addition, there were also the following records of compensation: - Compensation paid on 21/7/2021 to 23 community members represented by their representative MA for 46.13 ha (Lada Estate) - Compensation paid on 15/5/2018 to MM for 10.22 ha (Runtu Estate) - Compensation paid on 27/4/2018 to EK for 0.75 ha (Lada Estate) - Compensation paid on 27/4/2018 to CH for 0.58 ha (Lada Estate).	Yes
4.7.1 (C)	The mutually agreed procedure for identifying people entitled to compensation is documented under Land Dispute Settlement Procedure SSS-COMDEV(HMS)-024 dated 1/4/2014 and revised on 01-13 September 2016. The procedures were drafted taking into account FPIC processes and requirements and claims payable after carrying out on-site and document verification, compensation, and delivery letter (surat penyerahan)	Yes
4.7.2 (C)	The mutually agreed procedure for identifying people entitled to compensation is documented under Land Dispute Settlement Procedure SSS-COMDEV(HMS)-024 dated 1/4/2014 and revised on 01-13 September 2016. The procedures were drafted taking into account FPIC processes and requirements and claims payable after carrying out on-site and document verification, compensation, and delivery letter (surat penyerahan). Interviews with the local communities of Desa Sumber Agung, Desa Sg Rangit Jaya, Desa Lada Mandala Jaya, Desa Umpang and Desa Sg Melawen confirmed that the procedure was explained and made available to them.	Yes

Page **73** of **136**



4.7.3	The unit of certification is able to demonstrate that communities that have lost access and rights to land for plantation expansion have been given the opportunity to benefit from plantation development. This was confirmed during interviews held by the communities themselves, namely from Desa Sumber Agung, Desa Sg Rangit Jaya, Desa Lada Mandala Jaya, Desa Umpang and Desa Sg Melawen. Among the opportunities include partnership agreements with the Company to develop their plasma for oil palm smallholding. This has been implemented with the affected communities as confirmed during audit interviews and verified via documentation review. Among those sampled were AI (Desa Umpang), S (Desa Sumber Agong), and HS (Desa Desa Lada Maju Jaya).	Yes	
4.8.1	As described under Indicators 4.4.2 and 4.6.4 are proof of legal acquisition and compensation made in accordance with FPIC principles	Yes	
4.8.2 (C)	A previous conflict arose where 9 local communities from Desa Lada Mandala Jaya alleged land overlap with the Company's HGU. The matter was brought for mediation. As confirmed by the Village Head of Lada Mandala Jaya, and review of documents, it was found that on 13/10/2021, the claimants were required to give relevant documents and evidence of alleged land ownership which overlaps with the Company's HGU. This, the affected community was not able to produce. The last Mediation was held on 16/8/2023. Subsequently, via letter dated 4/9/2023 from the Company to Camat Pangkalan Lada (Ref 240/L/PB/IX/2023), the Company complaint about land encroachment by AJ, a local community who placed border markers on the Company's HGU. There has been no further progress on the matter.	Yes	
4.8.3	Based on documentation review and interviews conducted with the village heads, there is no evidence of any has been no evidence of any forced abandonment of customary or user rights prior to the current operations. All land acquisition and payment of compensation were mutually carried out with the affected communities.	Yes	
4.8.4	Based on documentation review and interviews conducted with the village heads, the Company has mapped out the area of alleged area of land dispute. However, it was determined that the area that the 9 villagers of Desa Landang Mandala Jaya, is actually on the Company's HGU.	Yes	
Principle 5: S	Principle 5: Support smallholder inclusion		
Indicator	Summary of Findings	Compliance (Y/N) and NC#	
5.1.1	The information on current and previous FFB price is available and documented. This is based on the monthly memos on FFB prices issued by the Kepala Dinas Perkebunan. Sampled during the audit	Yes	



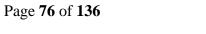


	were monthly minutes of meeting dated 5/6/2024, 5/7/2024, and 6/8/2024 issued by the Kepala Dinas Perkebunan. The minutes of meeting also stated that the fixing of FFB price is determined in accordance with the decision of the Kalimantan Tengah Governor. The unit of certification shares the FFB prices with the smallholders as evidenced by meeting records dated 30/10/2023, together with monthly updates directly to the smallholders. Sighted and verified were updates sent to to Desa Umpang smallholders in June and July 2024.	
5.1.2 (C)	The unit of certification shares the FFB prices with the smallholders as evidenced by meeting records dated 30/10/2023, together with monthly updates directly to the smallholders. Sighted and verified were updates sent to to Desa Umpang smallholders in June and July 2024.	Yes
5.1.3 (C)	Fair pricing, including premium pricing is agreed with the smallholders, and documented in the FFB supply agreements. Sampled during the audit were agreements signed with HS (Ketua Petani Plasma Desa Lada Mandala Jaya), S (Pengelola Plasma Sumebr Agong) and AI (Pengelola Plasma Umpang). It is stated under Article 4 of the agreement that FFB Purchase Price will be based on monthly decisions of the Ketua Dinas Perkebunan, Kotawaringin Barat, Kalimantan Tengah. Interview conducted with a smallholder (AI) also confirmed the above.	Yes
5.1.4 (C)	Based on smallholder list and audit interview held with Pengelola Plasma Umpang, evidence was available that the farmers are involved in decision-making process including the financing aspects e.g. repayment, amount to be set aside for replanting, etc. This also included women farmers. Sampled during the audit were women smallholders of Lada Mandala Jaya who own 2 ha and 0.75 ha respectively who agreed to set aside 5% of monthly FFB sale for replanting. During the audit interview, the smallholder recounted that they were briefed on the contents prior to signing, and he was able to recount the main contents of the agreement that he had signed. He also confirmed that the women in the group also understand the same.	Yes
5.1.5	Based on the review of the contracts entered into with the smallholders, FFB suppliers, FFB and EFB transporters, evidence was available that the contracts signed are fair, legal and have an agreed timeframe. Sampled agreements were the following:	Yes

Page **75** of **136**



	Contract for FFB purchase between the Company and MA of Koperasi Karya Tunggal Jaya dated 1/10/2019 and with C of Ketua Koperasi Tani Bahagia dated 1/9/2019. The contracts clearly state the object of the sale and purchase (i.e. sale and purchase of FFB), time and location for the delivery of the FFB, and that the price of the FFB will be decided based on the price determined by the Ketua Dinas Perkebunan Provinsi Kalimantan Tengah, terms and method of payment, payment terms, etc. The farmer interviewed also confirmed that each farmer was given a copy of the contract.	
5.1.6(C)	Based on the documents sighted and interview held with the farmers, the unit of certification was able to demonstrate that agreed payments are made in a timely manner. The payments are made directly into their bank accounts at Mandiri Bank. The receipts issued contain details such as district, farmer's name, FFB prices/kg, hectarage, year planted, FFB produced during that period, gross payment, less management and maintenance fees, replanting fund, net payment. Reviewed during the audit were records of payment made to AI from	Yes
	North Runtu for June and July 2024.	
5.1.7	The unit of certification was able to demonstrate that the weighing equipment has been calibrated and verified by an independent third party on an annual basis. The documents are:	Yes
	a) For Mill: Certificate No. 500.2.3/104/DPPKUKM.3/SKHP for weighbridge bearing serial No. ZM-510-212051061). Validity period is 6/2/2025.	
	b) For Mill: Certificate No. 500.2.3/105/DPPKUKM.3/SKHP for weighbridge bearing serial No. ZM-510-181550646). Validity period is 5/2/2025.	
	c) For Runtu Estate: Certificate No. 500.2.3/103/DPPKUKM.3/SKHP for weighbridge bearing serial No. ZM-510-200150069). Validity period is 7/2/2025.	
5.1.8	Based on interviews and documentation review, evidence is available that the unit of certification supports independent smallholders. Sighted were contracts signed with the following farmers: A) MA of Koperasi Karya Tunggal Jaya dated 1/10/2019; and B) C of Ketua Koperasi Tani Bahagia dated 1/9/2019.	Yes



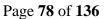


	Annual the consistent include a significant process DCDO	
	Among the support provided include socialisation about RSPO certification, best management practices on cultivation of oil palm, how to improve productivity, etc.	
5.1.9 (C)	Grievance mechanism available for all internal and external stakeholders (including smallholders) is stipulated in the Internal and External Grievance SOP No. SOP-HRD-07-R00. A review of the grievance book was done during the audit and no record of any grievance has been lodged by the smallholders.	Yes
5.2.1	As per document dated 30/10/2023, the unit of certification carried our consultation with interested smallholders to assess their needs and socialised the benefits of RSPO certification. This was also confirmed by farmer from Desa Umpang interviewed during the audit. Although there are women smallholders, neither of them attended the meeting on 30/10/2023.	Yes
5.2.2	Programmes for improving livelihood is part of the unit of certification's socialisation on RSPO certification, how productivity can be increased. Via letter Ref No. 209c/HRD/EKS//UP-SSS/VIII/dated 20/8/2024, smallholders were invited to attend a training session involving best oil palm cultivation practices, management of conservation area within an oil palm plantation, etc. The training was scheduled for 20/8/2024.	Yes
	Also confirmed by USAID during stakeholder consultation, that the Company has been providing technical support in getting smallholders from Koperasi Karya Tunggak Jaya to be RSPO certified (USAID). The Company has been providing technical support and trainer since early 2024 to train the smallholders on best management practices and improvement of SOPs.	
5.2.3	Support in promoting legality of FFB production is available in that the Lada Palm Oil Mill only accepts FFB from smallholders who could show evidence of land ownership. This was socialised to the smallholders in a meeting dated 30/10/2023.	Yes
5.2.4 (C)	There are no scheme smallholders within the unit of certification. Therefore, this Indicator is not relevant.	Yes
5.2.5	The progress of the smallholder support programme is regularly reviewed. The document reports on the progress of the stakeholder programme and is publicly reported. Please refer to the Company's website at https://unitedplantations.com/our-community/#Plasma-Development	Yes
Principle 6: R	espect workers' rights and conditions	
Indicator	Summary of Findings	Compliance (Y/N) and NC#
6.1.1 (C)	Non-discrimination and equal opportunity policies are available in the Human Rights Policy, October 1, 2022, and signed by President Director. This policy explains that the company provides equal	Yes

Page **77** of **136**

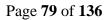


	treatment regardless of ethnicity, religion, racial, nationality, gender,	
	sexual orientation, membership union, political affiliation, age and disability, publicly available, and stakeholder can access it upon request.	
	The policy was implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities on May 2, 2024, at the mill, and on May 11, 2024, at the estate, as documented in the Minutes of Meeting and Attendance List for the Socialization of PT SSS 2024, includes a list of attendees and photo documentation.	
	At the company, no individual shall experience discrimination in employment, including in recruitment, compensation, promotion, training, disciplinary action, termination of employment, or retirement, based on gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights, or any other form of discrimination. The company maintains a zero-tolerance policy toward any form of harassment or abuse of authority, including physical, sexual, psychological, or verbal violence. All individuals must be treated with respect and dignity.	
	Every contract worker (PKWT) has the same opportunity to become a permanent worker based on selection and evaluation. Composition of workers consisting of various ethnic groups, religions, genders, and workers' origins. Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers. Placement and training of workers is conducting according to their expertise/type of work, and women workers are given reproductive leave rights, wages and the same opportunities for promotion as male workers in the same type of work.	
6.1.2 (C)	The job vacancy announcements presented by the company, such as the recruitment notice for harvesting labor, No. 067/HRD/EKS/UP-PT.SSS/II/2024, dated March 1, 2024, and the contract agreements between the company and workers, such as the Management Decree No. 005/SK-Pers/SSS/EDV/V/2024 on the appointment of permanent employees, indicated that no payment was required during the recruitment process. Additionally, the published job vacancies contained no discriminatory requirements based on gender, race or ethnicity, disability, sexual orientation, age, or belief.	Yes
	Based on interviews with the Union representative, and workers in the mill and estate, and review several employment procedures for recruitment, selection, hiring, promotion, retirement, termination and the its implementation (indicator 6.1.1), Master List of Employees for July 2024, Training Program for workers in the mill and estates in 2024 (indicator 3.7.1), payment for social secutiry period July 2024, there is no evidence the company discriminated against, and no	





	payment of recruitment fees for workers. The company implemented equal opportunities for all employees through the following:	
	All workers come from local and outside communities. They are many ethnic groups (Javanese, Sundanese, Minang, Batak).	
	The workers are women and men (office in the estate and mill, and plantation).	
	 Employment opportunities are provided fairly based on qualification and advertised in local mass media or local government offices. 	
	Training is given to the workers yearly covering training relating to their working station, personnel training such as communication skills, and safety and health training.	
	All employees are covered with social insurance; and Termination is conducted based on local laws and is stated in the employment agreement and the company regulation.	
6.1.3	During the audit, the company demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available through well-maintained employment documents.	Yes
	Recruitmen process starting with job application letters, CV, copies of identity cards, and supporting documents such as certificates, diplomas, transcripts, etc. The company keeps these files for applicants who are accepted for work, including result of writing test, result of interview and agreement contract signed by both parties, such as the recruitment notice for harvesting labor, No. 067/HRD/EKS/UP-PT.SSS/II/2024, dated March 1, 2024.	
	Promotion for workers in accordance management decree based on worker's appraisal on 3 criteria which is ability to work, how to work, and self-management, and recommendation from supervisor or superior. An example of such a promotion is in the document of promotion based on Management Decree No. 005/SK-Pers/SSS/EDV/V/2024 on the appointment of permanent employees on behalf of HAS.	
	On the indicator 3.7.1 above explained that the company has the training program for workers in the mill and estates, cover all operational and RSPO aspects and cover all parties who need training such as staff, workers, and contractors. This confirms that every worker has access to the training needed to improve their skills according to their field of work and for promotion.	
6.1.4	Based on interview with the Union representattive, with gender committee and women workers both at POM and estate revealed that the company not conducting pregnancy tests as part of the	Yes





	recruitment procedure. The pregnancy tests were only conducted for chemical material applicators to avoid the workers being exposed with chemical cause 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 (1-year-old of child).	
	Further explained that so far there had never been a pregnancy test which leads to a discriminatory measure.	
6.1.5 (C)	A gender committee is in place to deal with women's or gender issues, with the organizational structure period 2024-2026 based on Decree from the Management No. 001/SSS-Gender/UP-PT.SSS/V/2024. The structure consists of head of gender committee and representatives of division, which is members consisting of male and female workers.	Yes
	The committee conducted periodically meeting to discuss issues of concern, for instance, the last meeting is May 4, 2024, discussed about evaluation of work programs.	
	The work program outlined in the document "Program Kerja Gender Committee PT SSS, 2024" consists of reactivating the integrated health service posts (Posyandu) in the estate, conducting gender committee socialization, assessing the needs of new mothers, celebrating Mother's Day, and providing sexual violence prevention education for kindergarten children.	
	However, based on interviews with the gender committee officer and members, their understanding of the duties and responsibilities of the gender committee remains insufficient, particularly in terms of women's rights, providing counseling for women involved in violence cases, and addressing related issues such as sexual harassment and the fulfillment of reproductive rights.	
6.1.6	Equal payment of wages has been made by the company properly, considering the ability, performance, expertise, length of work and other factors as a basis for remuneration, so that the payment of wages provided is in accordance with the burden/duties/types of work respectively.	Yes
	Based on interviews with the Union representative and workers in the mill and estate, and verification of workers' wages by check at their pay slip July 2024 e.g. on behalf of WS (circle sanitation at Runtu Estate), and SW (Loose Fruit at Lada Estat), confirmed that the company has given the same wages for the same scope of work and same grade.	

Page **80** of **136**

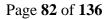


	Other supporting documents reviewed include the memo from the HR Manager No. 313/HRD/INT/UP-PT.SSS/XII/2023 regarding the 2024 minimum wage notification, and the Governor of Central Kalimantan's Decree No. 188.44/552/2023 concerning the 2024 minimum wage for regencies/city. These two documents serve as the basis for determining workers' wages for 2024 and have been implemented. In addition, the company has established a wage structure and scale for 2024 through a memo from the Director, No. 010/SK/SSS-Direksi/I/2024, dated January 2, 2024, regarding the wage structure and scale, and has been implemented by checking the summary of employee salary July 2024.	
	However, a cross-examination of wage data at the Office of Labor in Kotawaringin Barat Regency revealed reports of worker dissatisfaction with the harvesting wages provided by the company. Based on this finding, we held discussions with the Industrial Relations Department and HR staff of the company, as well as reviewed the payslips of harvesting workers. As a result, we found that the piece-rate system applied for harvesting has not been fully understood by some harvesters. Therefore, the company needs to conduct more frequent socialization sessions with its harvesting workers.	
6.2.1 (C)	The company regulated work relationship, leave and permission, salary payment, welfare and insurance, business trip allowance, disciplinary, mutation, work termination, grievance and complaint and others in Collective Labor Agreement which has been registered with the Manpower Office of Kotawaringin Barat Regency under No. Kep.500.15.12.1/61.a/Disnakertrans/V/2024. The document explains in detail the working conditions and rights/obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. Examples of its implementation have been explained in indicators 3.5.1, 3.5.2, 6.1.1, 6.1.2 and 6.1.3.	Yes
	In the CLA, only direct hires' employment which is arranged. Other types such as contractual workers (PKWT) and outsourcing arrange in another document such as contractual agreement between the company and the contract workers, or between contractors and workers (for outsourcing). All information in the CLA in Bahasa Indonesian and has been socialized to workers on May 2, 2024, at the mill, and on May 11, 2024, at the estate, as documented in the Minutes of Meeting and Attendance List for the Socialization of PT SSS 2024, includes a list of attendees and photo documentation.	
	Based on interviews with the Union representative and workers in mill and estate, it concluded that workers have a sufficient understanding of their rights (wages, overtime, incentives, etc.) listed in the CLA.	

Page **81** of **136**



	Based on memo from the HR Manager No. 313/HRD/INT/UP-PT.SSS/XII/2023 regarding the 2024 minimum wage notification, has been sets the wages of employees in 2024 referring to Governor of Central Kalimantan's Decree No. 188.44/552/2023 concerning the 2024 minimum wage for regencies/city. The implementation of the memo was recorded in the worker's pay slip, payroll document, wage structure and scale for 2024, and the summary of employee salary July 2024 (explained in indicator 6.1.6) and confirmed by the results of interviews with workers. Based on the description above, it can be concluded that the company already has documentation of wages and work requirements in accordance with applicable labor regulations for workers in the national language, along with explanations for workers in a language they understand.	
6.2.2 (C)	During the audit, several employment contracts and payments were reviewed to verification the work conditions set by the company and agreed upon with the union and recorded in the CLA. Examples of employment contracts are harvesting labor contract No. 067/HRD/EKS/UP-PT.SSS/II/2024, dated March 1, 2024, and the contract agreement No. 005/SK-Pers/SSS/EDV/V/2024 on the appointment of permanent employees, pay slip July 2024 on behalf of WS (circle sanitation at Runtu Estate), and SW (Loose Fruit at Lada Estat), wage structure and scale for 2024, and the summary of employee salary July 2024.	Yes
	Based on review, the contracts have been explaining the terms of work, working time and wages, permits, social security, leave rights, facilities and PPE, worker obligations, training and development, discipline and sanctions, industrial relations, contract termination, etc. The contents of the contracts are in accordance with applicable regulations, prepared in languages understood by the workers, explained to workers by management officials, and signed by both the authorized signatory of the company and employee.	
	Based on the explanation above, the company has good documentation related to regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice which has been informed in the CLA. Based on interviews with the Union representative and workers in the mill and estate, confirmed that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the CLA, consistent with the employment contracts and in accordance with routine socialization provided by the company.	
6.2.3 (C)	The Collective Labor Agreement which is explained in indicator 6.2.1 arranges in detail regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal,	Yes





	and period of notice which complied with Indonesian legal requirements (e.g., Act No. 6/2023, Act No. 13/2003, Government Regulation No. 35/2021, Government Regulation No. 36/2021 and Government Regulation No. 51/2023). During the audit, we reviewed several documents which is showed by the company as evidence of compliance with labor provisions such as harvesting labor contract No. 067/HRD/EKS/UP-PT.SSS/II/2024, dated March 1, 2024, and the contract agreement No. 005/SK-Pers/SSS/EDV/V/2024 on the appointment of permanent employees,	
	pay slip July 2024 on behalf of WS (circle sanitation at Runtu Estate), and SW (Loose Fruit at Lada Estate), wage structure and scale for 2024, summary of employee salary July 2024, and employee overtime recap July 2024. The result of the review concluded that the company has paid overtime wages according to the workers' overtime hours and has complied with the applicable regulations. Based on interviews with the Union representative and workers in the mill and estate, in note that there's no indication about the force labor. Workers have been given leave, get the wages and overtime pay accordance with the wage minimum regulation. Deduction for workers such as social security, tax and loan, consistent with the CLA.	
6.2.4 (C)	Based on review of the list of social facilities for employee 2024, interviews with the Union representative, workers in the mill and estate, and field observation to the workers housing at the mill and estate, the company has provided welfare facilities for its employee, including permanent housing, clinics, water supply, electricity, education, transportation, places of worship (mosques and churches), sports facilities, and more. Field visits to the housing areas of Lada POM, Runtu Estate, and Lada Estate revealed that workers are provided with adequate housing, consisting of 2 bedrooms, 1 bathroom, and a daycare for children aged 2-6 years. Each house accommodates one family, and for unmarried workers, each house is shared by 2-3 individuals. The company also has a reliable water supply from drilled wells, which ensures no shortage. Additionally, the company operates clinics with competent and certified medical staff. Children of employees have access to good educational facilities, from kindergarten to high school. Overall, the facilities provided by the company are suitable for workers and their families.	Yes
6.2.5	Where the workers live (housing) is not located at remote area, there are basic food stores and traditional markets available. There are shop houses and canteen in settlements on the estate and mill that can be used by workers and their family to be providing their basic need.	Yes
	Besides that, the company has made it easier for workers and their families to obtain food sources by providing employee cooperatives	

Page **83** of **136**

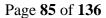


	(Karya Mulia Sejahtera Cooperative) that pro- needs of workers. Based on interviews with the Union represental and their family in the mill and estate housing, have no difficulty in getting basic needs due to shop houses and cooperative with normal price	tive and with workers in note that workers the existence of the			
6.2.6	Indonesia is one of the countries where the live determined by the government. The company employees based on the national minimum wag is determined by the local government (see Inc.)	Yes			
	government, excluding some facilities such a	Workers have been paid by using minimum wages stated by the local government, excluding some facilities such as education, housing, water, electricity, and childcare which provided by the company.			
	Besides that, the company has assessed prevail of jobs that refer to the Company's Annual Budg Wages, and RSPO Guidance on Calculating Pre The calculation described allowance and facilitie electricity, housing, water, education, childcar prepared by HR Department. Below illustrates D 2024 in the company. Tabel of Prevailing Wage Calculation of the				
	Prevailing Wage Calculation for PTSSS				
	In-kind Benefits	Amount (Rp)			
	Housing Estimated Cost of Building (as per market value in 2020)	1.573.000.000,00			
	Service Life of House (years)	-			
	Annual Maintenance	2.644.519.192,00			
	Number of Houses	492,00			
	Total Cost of Housing	-			
	Electricity and Water				
	Total cost of Electricity and Water (PTSSS provides subsidized rate)	-			
	Education				
	Total cost of Education	_			
	Creche Facilities	302.828,72			
	Total cost of Creche	302.828,72			
	Healthcare				
	Total Cost for Healthcare	714.759,97			





	Total cost of In Kind Benefits	1.017.588,69	
	Average Monthly Take Home Salary Per	4.580.950,58	
	Worker	,	
	Total Value of Prevailing Wage	5.598.539,27	
627	Minimum Wage 2024	3.474.797,00	
6.2.7	Based on interviews with HRD staff, with the and workers in the mill and estate, and revie Employees for July 2024, the company no long casual daily contract (BHL). Currently the corpermanent, full-time employment is used for a harvesting in the estate and processing in the mialso contract workers (PKWT) which employed for as upkeep and other supporting jobs. The company have been reported all permanen the Manpower Office on June 17, 2024, based of Lapor Ketenagakerjaan di Perusahaan. The corrall their contract workers (PKWT) to the Man regular basis, and it has confirmed during companyer Office representative that the use (PKWT) carried out by the company is followed.	ew of Master List of ger had workers with mpany only employs all core work such as ill. Besides that, there or non-core work such workers by online to a document of <i>Wajib</i> mpany also reported apower Office on a consultation with the of contract workers	Yes
6.3.1 (C)	Freedom of association and right to collective explicitly explained in the Human Rights Policy, Union Policy, October 25, 2023. Both policies president Director. The policy stated commitme giving freedom to workers to form collective bargunions. The policy has been implemented and communathe workforce, suppliers, contractors, and loca May 2, 2024, at the mill, and on May 11, 202 documented in the Minutes of Meeting and Att Socialization of PT SSS 2024, includes a list of documentation. There is labor union in the scope of the company in drafting the CLA, as evidence the implement policies i.e. PUK-FSPPP-SPSI PT Surya Sawit Sey Manpower Office of Kotawaringin Barat F 500.15.13.1/14/Disnakertrans.IV/2023 dated Ja Also, there is LKS Bipartite of Surya Sawit Stregistered with the Manpower Office of Kotawarunder No. KEP.68/DTT/HIJ-SYAKER/XI/2021 of 2021.	October 1, 2022, and were signed by the ment the company to gaining and join labor licated to all levels of 1 communities on on 24, at the estate, as tendance List for the attendees and photo which is participated intation of the above jati, registered to the Regency under No. nuary 8, 2024. Sejati and has been ringin Barat Regency dated November 24,	Yes
	Based on interviews with the Union's represent in the mill and estate, confirmed that all work	ers allowed to form	





	associations, no restriction to join and bargain collectively with their employer.	
6.3.2	The company maintained records of bipartite meetings. Based on documents review and interview with the unions and bipartite representatives, the last meeting held was on January 5, 2024, with the agenda of negotiation of a new Collective Labor Agreement. Minutes of meeting are documented in Bahasa Indonesia and available to members upon request. Still based on information from bipartite representatives, the Unions hold meetings every month if there is an issue, but if not, meetings are not held until deemed necessary.	Yes
6.3.3	Based on interview with the Unions and company representative (bipartite), confirmed there is no interference of the company with the formation or operation of registered the union organizations. Everything was planned and conducted based on the agreement between the management of the Unions and workers. The company gives freedom for the unions to express their opinion.	Yes
6.4.1	A formal policy for protection of children including prohibition of child labour is explicitly explained in the Human Rights Policy, October 1, 2022, and signed by the president Director, which explains that the company does not tolerate the use of child labor, nor does it exploit children in all its operational areas and facilities. That policy states that it is forbidden to employ child labor under the age of 18 (eighteen) years. Besides having a policy governing the minimum age for workers, the company also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement with the contractor.	Yes
	The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities on May 2, 2024, at the mill, and on May 11, 2024, at the estate, as documented in the Minutes of Meeting and Attendance List for the Socialization of PT SSS 2024, includes a list of attendees and photo documentation.	
	Based on an interview with a community representative surrounding the company, confirmed there is no child labour in the plantation and mill. Based on review of the Master List of Employees for July 2024, no child labor was found in the list. Based on the review of the contractual agreement between the company and their contractors for instance, contractual agreement under No. 002/SPK-SSS/I/2024 dated January 2, 2024, and contractual agreement under No. 007/SPK-SSS/I/2024 dated January 2, 2024, the prohibition of child labor requirements included in contracts.	
6.4.2 (C)	The company has a policy (see indicator 6.4.1), recruitment procedure, and Collective Labor Agreement (see indicator 6.1.1) which stated and ensure not hiring employees under 18 years old.	Yes

Page **86** of **136**



	This minimum working age complied with national regulation (Act No.13/2003 sub chapter 68). Based on review of the Master List of Employees for July 2024, and interviews with the Unions representative and workers in the mill and estate, and field observation, ensure that there is no child labor in the mill and estate.	
6.4.3 (C)	In the context of oil palm plantations of RSPO members in Indonesia, young workers are not recognized, but sometimes 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, during the audit, the company does not accept students from outside mill/plantations who do field work practice (apprenticeship) in mill and estate.	Yes
6.4.4	The policy (see indicator 6.4.1 above) have been socialized to all level workforce on on May 2, 2024, at the mill, and on May 11, 2024, at the estate, as documented in the Minutes of Meeting and Attendance List for the Socialization of PT SSS 2024, includes a list of attendees and photo documentation. To prevent contractors and suppliers from employing workers below the minimum age requirement, the company incorporates this requirement into every contractual agreement, for instance, contractual agreement under No. 002/SPK-SSS/I/2024 dated January 2, 2024, and contractual agreement under No. 007/SPK-SSS/I/2024 dated January 2, 2024.	Yes
6.5.1 (C)	A formal policy to prohibit any form of sexual and all other forms of harassment and violence is explicitly explained in the Human Rights Policy, October 1, 2022, and signed by the president Director, which confirms the company's commitment to zero tolerance for any form of harassment, intimidation or violence. The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities on May 2, 2024, at the mill, and on May 11, 2024, at the estate, as documented in the Minutes of Meeting and Attendance List for the Socialization of PT SSS 2024, includes a list of attendees and photo documentation.	Yes
	To support the policy, the company has formed a Gender Committee in each unit (has been explained in indicator 6.1.5 above) as a place to submit complaints and grievance regarding sexual harassment and violations of reproductive rights of women, through protocol flowchart for sexual harassment reporting based on procedure of <i>Keluh Kesah Internal dan Eksternal</i> under No. SOP-HRD-07-R00, January 1, 2015. Based on the review of the complaint, grievance, and communication logbook, and interview with gender committee representatives, and	

Page **87** of **136**

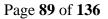


	Ţ.	
	workers at the mill and estate, there is no case of sexual and all other forms of harassment and violence in the workplace being reported.	
6.5.2 (C)	A formal policy to protect the reproductive rights of all, especially of women is explicitly explained in the <i>Kebijakan Perlindungan Hak-hak Perempuan untuk Hamil dan Melahirkan,</i> October 1, 2022, and signed by the President Director, which emphasizes that reproductive rights in line with state law must be respected.	Yes
	The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities on May 2, 2024, at the mill, and on May 11, 2024, at the estate, as documented in the Minutes of Meeting and Attendance List for the Socialization of PT SSS 2024, includes a list of attendees and photo documentation.	
	To illustrate implementation of this policy is the provision of menstrual and maternity leave rights for women, which is regulated in detail in the CLA. The company given menstrual leave for female worker for two days based on recommendations from clinical examination results. Maternity leave was given three months of paid leave, 1,5 months before give birth and 1,5 months after.	
6.5.3	Over the past year, there have been no female workers who were pregnant, gave birth, or were breastfeeding. This information was obtained from the examination of employee records at the company clinic and interviews with the gender committee during the audit. However, if there is a new mother, the company will assess her needs by seeking her input and taking actions to fulfill them. Based on previous new mother assessments, the company has accommodated them by providing light work that does not involve exposure to chemicals, daycare facilities, three months of paid maternity leave, and permission for late arrival or early departure for pregnancy check-ups or breastfeeding. The company has also provided adequate facilities for breastfeeding babies under 24 months, as well as for pumping and storing breast milk, while maintaining privacy.	Yes
6.5.4	Mechanism to handle employment grievances which is developed by the company is in the procedure of <i>Keluh Kesah Internal dan Eksternal</i> under No. SOP-HRD-07-R00, January 1, 2015, and Violation Reporting Mechanism under No. SOP SSS-EST-30 dated December 23rd, 2017.	Yes
	Grievance can be submitted through recording in the logbook that has been provided, directly to the foreman, and or HR representative in the mill or estate. This procedure includes respects anonymity and protects complainants where requested, e.g. if report a grievance againts a supervisor. The procedure has been implemented and socialized to all level workforce, contractors, suppliers, smallholders, and relevant stakeholders (e.g., community) on May 2, 2024, at the mill, and on	

Page 88 of 136



	May 11, 2024, at the estate, as documented in the Minutes of Meeting and Attendance List for the Socialization of PT SSS 2024, includes a list of attendees and photo documentation. This mechanism is equipped with a logbook of grievance which records the details of incoming reports.	
6.6.1 (C)	Based on interviews with the Union representative and workers in the mill and estate, and review of the Master List of Employees for July 2024, there is no migrant workers in the company, and there is no evidence there are forms of forced and trafficked labor, no payment of recruitment fees, no detention of worker documents, no forced overtime work, no obstruction for workers to quit. All workers work freely.	Yes
	The company has established and documented policy about force or trafficked labour is in the Human Rights Policy, October 1, 2022, and signed by the president Director. Based on the policies, the company has a zero-tolerance regarding the use of forced labor, slavery, or human trafficking in its plantations and other facilities.	
	Each contractual agreement between the company and contractor or supplier, there were clauses related to fulfilling legal obligations in Indonesia, which is some of these are related to anti-bribery, anti-corruption, and anti-forced labor. To ensure compliance with these clauses, the company always requests the requirements for the completeness before contractor does work.	
	According to the Union and gender committee representative which is in line with the results of consultations with Manpower Office representative, there is no issue of discrimination and forced labor in the company, and there were no significant obstacles related to employment or violations of the company regulations.	
6.6.2 (C)	Based on a review of the special labor procedure i.e. procedure of <i>Rekruitmen Karyawan PKWT</i> under No. SOP-HRD-REV-03-R00, June 10, 2023, and signed by the President Director, put in place by the company notes that all workers, regardless of origin, receive the same treatment without having to marginalize, favor, or disadvantage a worker on grounds not provided for in the legislation.	Yes
	During the audit, it should be noted that the company employing Indonesians from various ethnic groups (there is no migrant workers). Based on interviews with the staff of Human Resources Department, and a review of a sample of workers (selected based on ethnic group), indicate that all workers receive proposals for individual employment contracts, which they read beforehand and for which they can be assisted for a better understanding before signing.	
	All workers, without exception, receive work instructions, and on-the- job inductions and unload the Job Link and Integration Sheet for new	





	hires, proof that they have been effectively briefed on the information concerning them.	
6.7.1 (C)	PT SSS (POM and Estate) has appointed a person responsible for OHS in each unit, namely the P2K3 team which is currently in the process of approving the P2K3 team by the relevant Agency. The effectiveness of the OSH plan has been monitored through monthly P2K3 meetings and reporting every 3 months to the relevant agencies. OSH and welfare issues are discussed in P2K3 meetings. Example:	Yes
	Notulen Meeting on June 26, 2024 in meeting room Lada Estate Division I with agenda: Accident in work operation, investigation, HIRARC, OHS aware, PPE discipline, training, MCU, Emergency Response and Welfare aspect.	
	The meetings P2K3 are concern of all parties about health, safety and welfare discussed at this meeting. If the issues raised , there is action taken on.	
	Based on the explanation above, it is known that an OHS organization has been formed with an adequate number of personnel in accordance with the laws and regulations.	
	Based on the results of interviews with related agencies, the company's OHS committee structure has been approved by the relevant agencies in accordance with statutory regulations.	
6.7.2	The company has an SOP related to emergency and accidents in the SOP No.SSS-ESH-007, dated April 30, 2024.	Yes
	The accident procedure available in appropriate language. Work accidents have been investigated and evaluated through HIRAC documents so that they do not recur. Work accident recording documents have been documented which consist of reporting work accidents to the department, BPJS, investigation results, etc.	
	Based on interviews with workers in estate and POM, it can be seen that they understand work accident procedures by clearly explaining the stages if a work accident occurs in their respective workplaces. First aid officers and first aid providers are available in the field. For example, the foreman in the harvest, spray and fertilizer activities has brought and explained the function of the contents of the first aid bag brought to the field.	
	The company holds refresher First Aid training every year for workers, especially for First Aid officers such as foremen, warehouse officers, KTU etc. An example of refresher training of first aid box holders was held at the Lada Estate on August 12, 2024 and was attended by 20 employees who are First Aid officers in each division.	

Page 90 of 136



	First aid facilities are available at the workplace or during manual field work carried by each field foreman. Field first aid officers are ready to assist in the use of first aid and complete provision has been demonstrated by the company. Based on field visits and interviews with first aid officers, namely field foremen, it appears that first aid facilities are available complete with usage records and officers can explain that if stocks are reduced due to use in the field, the company will provide them in each operational (estate and POM).	
6.7.3 (C)	The unit of certification shows documents related to the provision of PPE in the SOP document Mechanism for Provision and Replacement of Personal Protective Equipment Number SSS-EST-27. In the guidelines it is stated that for PPE that has been damaged/cannot function properly before the specified replacement frequency, you can request replacement by bringing the old PPE and get approval from their respective superiors.	Yes
	In the context of implementing these regulations, the company provides adequate Personal Protective Equipment (PPE) according to its designation for each worker.	
	In line with the results of document verification, the spray workers at Runtu Estate also explained that employees had received PPE free of charge by the company and understood the mechanism for replacing PPE if PPE was damaged/lost. The PPE used by workers is currently in good condition and ready to use.	
	Sanitation Facilities	
	Based on the results of the field visit, it is known that the company already has sanitation facilities for workers with chemicals that can clean themselves as well as the equipment used and change clothes, which is also equipped with a storage area for controlling devices and PPE, this is in accordance with the results of interviews with spray workers for example in Block 9 Lada Estate. Based on interviews with spray and fertilizer workers at Lada Estate, the company has provided sanitation facilities that can be used by workers to remove PPE, clean themselves and put on their personal clothing.	V
6.7.4	The company has a policy to register workers to BPJS (social assurance) as explained in Company Regulations where the company through BPJS registers a social security program for employees in accordance with applicable regulations. This can be proven by showing proof of payment of BPJS for Employment and Health in July-August 2024 for each unit. Based on the results of document review	Yes



	and interviews with company representatives, it is known that the workers provided by insurance in accordance to national regulation (BPJS) that consist of BPJS of health and BPJS of employment. The company has policies related to social insurance and health insurance in industrial relations policies in the PT SSS which was ratified by the President Director on 1 October 2021. In addition, there are social insurance and health insurance in the labor agreement for the 2023-2024 period. The company guarantees social protection in collaboration with social assurance. In addition, the company enrolls in the health insurance program so that workers have the benefits of health care and protection of their basic health needs. The company also provides medical center facilities as a means of first aid in accidents. The company has also provided health facilities, such as clinics, trained paramedics, licensed first aid workers, medicines, vitamins and other health equipment. In addition, the company helps with the claim process if there is an employee's work accident. Based on the description above, it shows that all workers are provided with health services and are protected by work accident insurance. Costs incurred as a result of work incidents, resulting in injury or	
6.7.5	illness, are borne in accordance with applicable regulations.	Yes
	The company shows a table for calculating the Frequency Rate (FR) and Severity Rate (SR) for Lada Estate, Runtu Estate, Arut Estate, Kumai Estate and Lada POM for the period January to December 2023 using LTA. The company has conduct monitoring and review the LTA every month in OSH meeting. The OSH specialist conduct review the LTA. The OSH Specialist has been trained by Manpower Minister and hold certificate of competency. FR: 116.20 SR: 324.87	res
Principle 7: Pr	otect, conserve and enhance ecosystems and the environment	Compliance
Indicator	Summary of Findings	Compliance (Y/N) and NC#
7.1.1 (C)	The company has shown evidences that pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) method. The IPM programs in PT Surya Sawit Sejati includes the development of the planting of Turnera subulata, Antigonon leptopus and carrying out the use of natural enemies of pests such as Felis bengalensis and etc.	Yes

Page **92** of **136**



	The company has shown documentation of monthly potential pest and disease detection of each unit that conducted by trained worker. Based on census summary and maps of infestation of January – July 2024 known that there was no pest and disease infestation exceed the economical threshold, therefore no usage of pesticide to pest and disease control, except for routine weed control.	
7.1.2	The company utilizes plants that are useful for biological control of pests and diseases that are useful for the Program Integrated Pest Management (IPM). The company has used beneficial plants, including <i>Turnera subulate, Cascia cobanensis and antigonon</i> . All of these species are not classified as invasive species according to Minister of Environment and Forestry Regulation Number P.94/MENLHK/SETJEN/KUM.1/12/2016, so it can be concluded that there is no use of invasive species for pest control. Based on the results of a field visit to harvesting activities block 53 Division 1 of Lada Estate, it is known that, no rat attacks were found.	Yes
7.1.3	PT SSS will not use fire to control pests and diseases of oil palm plants in plantations. The company only uses pesticides if the number of pests is above the economic threshold, beneficial plats and tyto alba to control the pests. Based on several pest control procedures, it is known that there are no burning recommendations for pest control. From observations and interviews with representatives of government agencies and pesticide users in all plantations, it is known that there is no evidence that the company has ever used fire to control pests and diseases of oil palm plants on plantation land. Based on the document reviews, field observations, and interviews with worker and stakeholder, it is known that the company does not use fire to control pests and from the results of field observations to harvesting activities, no burn marks were found in the areal visited by the auditors.	Yes
7.2.1 (C)	The company justifies the use of pesticides each fiscal year by referring to the Green Book List issued by the Ministry of Agriculture, where the use of pesticide chemicals is selected for certain targets such as chemist gate care, plate care and chemist pickle markets. The company has a list of the use of herbicide and pesticide chemicals in accordance with the provisions of the Pesticide Commission of the Ministry of Agriculture in each estate (Lada Estate and Runtu Estate) during 2023/2024, this document lists the types and quantities of herbicides and pesticides including their active ingredients, permanent distribution permits, validity period, and weed control purposes as recommended by the Agronomist, hectares of application and manufacturer's dosage per hectare. The company has a Pesticide Recommendation for the usage of pest, weed and disease control. However, current routine usage just for	Yes

Page **93** of **136**



	weed control because there is no pest and disease infestation above the economic threshold. The company has demonstrated policies related to safety in the use of chemicals listed in SOP No. SSS- EST- 03 dated December 10, 2007. The company has made efforts to avoid the development of resistance to weeds such as the use of different types of pesticides, regulating spray rotation and spraying according to target weeds (selective weeding). The Pesticides Recommendation inform the pesticides trademark, active ingredients, type (systemic/contact), LD50, target species, and WHO class. Based on field visit and interviews with pesticide applicators in block 9 division 1 Lada Estate (spraying activities) it is known that worker have carried out spraying in accordance with their procedures such as not spraying near water bodies, have knowledge of the types of pesticides used, understand the dosages used as well as being able to identify the intended target weed. Based on this, it can be concluded that the company can demonstrate procedures and implementation related to safety in the use of chemicals.	
7.2.2 (C)	The CH has maintained records of pesticide use. It has been shown in the pesticide list document which contains the brand of the pesticide, the active ingredient, LD50, and the use of the active ingredient per hectare. For example, periode January to December 2023 Supremo 480 SL with an LD50 of 4467 mg/kg. in the period January to March 2024 0.66 gram/ha has been applied.	Yes
7.2.3 (C)	The CH has a commitment to minimize the use of pesticides and has the IPM concept. This is evidenced by the results of field observations where Turnera subulata and Antigonon leptosus were found on roadsides with the aim of controlling bugworm. The results of field observations also revealed that there were natural control for rats that had been properly monitored. The results of the document review revealed the trend of using the pesticide for the last 3 years (2022-2024). Evidence of implementation of the Integrated Pest Management (IPM) plan and mitigation of pesticide use according to the IPM plan includes planting beneficial plants (Turnera subulata, Antigonon leptosus and Cassia cobanensis) as hosts/nests for natural predators of fire caterpillars which are planted and well cared for in the main road area and collection road to prevent attacks by fireworms and bagworms; then the use of Felis bengalensis as natural predators of rodents (rats) so as to minimize the use of rodenticides throughout the estate.	Yes
7.2.4	There is no prophylactic way of using pesticides carried out by the company. The company controls using pesticides if the pest attack census shows results above the threshold. Whereas for weed control If the conditions of the circle and harvest pathway are still quite standard, weed control will be postponed. Based on observations of	Yes

Page **94** of **136**



	spraying activities, the application method is not a preventive application but is more selective for locations that have weeds. Based on interviews with company representatives, it is known that the use of pesticides in a preventive manner (prophylactic use) is not justified by the company. Control using chemicals is carried out if the pest attack has exceeded the threshold, based on the census.	
7.2.5	The CH has a commitment/policy not to use pesticides that are included in WHO classes 1A and 1B, or included in the Stockholm convention, as well as paraquat. Apart from that, the company has a biological integrated pest control (IPM) plan by planting beneficial plants (Turnera subulata, Antigonon leptosus and Cassia cobanensis) as hosts/nests for natural predators of fire caterpillars which are planted and well maintained in the main road and collection road areas to prevent fireworm and bagworm attacks; then the use of Felis bengalensis as natural predators of rodents (rats) so as to minimize the use of rodenticides throughout the estate. Based on the IPM report document for the 2023/2024 period, it is known that the intensity of plant pest attacks in plantations is still below the economic threshold.	Yes
7.2.6 (C)	Pesticide applicators are special people who have been equipped with competencies regarding pesticide handling. Evidence of this can be seen from socialization of SOP Spraying and HIRARC on July 25, 2024 (Runtu Estate) and August 08, 2024 (Lada Estate). Pesticide applications have been carried out by persons who have completed the necessary training, and have been applied according	Yes
	to the product label (MSDS). The results of interviews during field observations at the circle spraying at block 9 division 1 Lada Estate revealed that workers were able to explain the safe handling of pesticides according to procedures. Informed by informants that they have received training in handling pesticides from the company. The results of field observations also show that workers have implemented safe work techniques and wearing appropriate PPE.	
7.2.7 (C)	The company has documented storage of all pesticides in accordance with recognized best practices. The results of field observations in the Pesticides Warehouse area in Lada Estate and Runtu Estate show that pesticides have been grouped by type, there is an MSDS in a language understood by workers, symbols for hazardous and toxic substances, in a place with good air circulation and sufficient lighting. The warehouse is locked and there is a limited area warning and the use of PPE when accessing it. The results of interviews with workers revealed that workers could explain and demonstrate safe work techniques in that area, all chemicals were stored properly, officers carried out regular monitoring of all	Yes

Page **95** of **136**



	incoming and outgoing materials as well as expired chemicals.	
7.2.8	The company have SOP for proper disposal of pesticide containers, that covered at SOP No.SSS-EHS-005, revision 3, dated August 15, 2020 (<i>Pengelolaan Limbah Berbahaya dan Beracun</i>).	Yes
	Based on the results of a visit to the Temporary Hazardous Waste at Lada Estate and Runtu Estate, it is known that the company has stored the pesticide container in the temporary hazardous waste and each officer at the temporary hazardous waste can explain procedures for handling and managing the appropriate hazardous waste in according with the procedure. For example, the company has shown evidence of submitting hazardoust waste to PT Pratama Saolon Green. Based on observations at the chemical material/pesticide warehouses in the Lada Estate and Runtu Estate Residential Areas, it is known that the company has provided a special mixing place and a container for used contaminated/rinse water to be reused in the next mixing. In addition, pesticide containers have been handled responsibly by storing them in a hazardous waste storage area.	
7.2.9 (C)	Cannot be applied because no aerial pesticides are used on the plantation. Based on the document review, interviews with sprayer applicators and interviews with company representatives, it is known that the application of pesticides by air has never been carried out. In addition, the certification unit also does not have the facilities and infrastructure to apply pesticides through the air.	Yes
7.2.10 (C)	The company has documented periodic health checks and special health once a year for all workers (audiometry, cholinesterase and spirometry) for certain workers in plantations (manuring, spraying operators and chemical warehouse staff) and Mill (WTP staff, chemical warehouse, laboratory). which was carried out on November 2023. Based on a review of MCU documents, it is known that there are no employees who have cholinesterase levels exceeding normal limits, and indications of exposure to chemicals such as itching, skin irritation, poisoning or others so they can still carry out spraying work in the field. All workers in Estate and POM already know the results of the examination.	Yes
7.2.11 (C)	The CH has a commitment regarding pesticide applicators not being carried out by pregnant or lactating women, or people with medical limitations. The company has a policy for female employees/workers who are pregnant which was signed by the President Director on October 1, 2022, in the policy it is explained that, for female employees/workers who are pregnant the following policy applies to Point 5 Types of Work for Female Employees who are Pregnancy and Breastfeeding "During pregnancy and lactation, female employees are	Yes

Page **96** of **136**

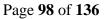


	prohibited from being employed in parts exposed to chemicals and heavy work. The results of field observations at the circle spraying activity in block 9 Division 1 Lada Estate found that there were no female workers who were pregnant and/or breastfeeding, or with medical limitations. The results of the interviews revealed that women workers who were pregnant or breastfeeding, or workers with medical limitations were transferred to non-pesticide jobs. Based on this, it is known that there are no workers who are pregnant, or breastfeeding, or with medical limitations who apply pesticides.	
7.3.1	The Unit of Certification already has document related to waste management, stated in Waste Management Procedure No. SSS- EST-21 rev. 01 dated 15 August 2020. This procedure was made to ensure that the management of hazardous and toxic waste is carried out in a responsible manner and to prevent contamination/pollution of the environment by its waste, in accordance with applicable law (referring to PP RI No. 22 of 2021 concerning the implementation of protection and environmental management. Includes; scope and responsibility, references, procedures, identification, storage of hazardous and toxic waste materials, storage methods, storage time, waste recording, transportation and collection, reporting, OHS, and emergency response), specific hazardous waste symbols.	Yes
	The company stores waste in a temporary bin at the unit before being transferred by their own operator to a licensed hazardous storage, with the procedure for Storage and Delivery of Hazardous Waste from the unit to licensed hazardous storage (with Work Instruction number. 001/IK/ESH/SSS/IV/2022) April 12, 2022. With a description; • Each work unit is allowed to temporarily store hazardous waste • The waste must be sent to licensed hazardous storage if the waste volume is sufficient	
	The identification of waste sources for the 2023 period with details: used pesticide packaging, medical waste, used iron, used fertilizer sacks, palm fronds, organic waste, an organic waste, paper waste, grey water from domestic, POME, etc.	
	Hazardous and Toxic Waste Unit certification has a temporary storage permit for hazardous and toxic waste, through the document; Permit for temporary storage of hazardous and toxic waste materials PT Surya Sawit Sejati – Lada Estate & Lada POM through the Decree of the Head of Dinas Penanaman Modal dan Pelayana Terpadu Satu Pintu (DMPTSP) Kotawaringin Barat Regency No. 503/020/LH/DPMPTSP.D dated October 31, 2019, with a validity	

Page **97** of **136**



	period of 5 years. Coordinates of storage area at 02°34'47.6 LS and 111°46'25'2" BT. Based on field observations at the licensed hazardous waste storage located at Lada Estate and Runtu Estate, it is known that the storage building is a permanent building with ventilation according to the coordinates on the permit. In addition, there are emergency response facilities such as fire extinguisher, eye wash, alarm, symbols and labels, sand powder to clean up spills, first aid kits, and a logbook. The types of waste that may be stored include; used lubricating oil, used hazardous packaging, used LED lamps, medical waste, waste	
	from laboratories containing hazardous materials, and used rags from their activities.	
	Solid waste	
	The solid waste produced by the company is shell, fiber and empty fruit bunch. The management plan is carried out by reusing solid waste such as shells and fiber to be reused as boiler fuel. Meanwhile, solid waste such as EFB is reused by applying it to plantation areas.	
	Liquid Waste (POME)	
	Liquid waste generated from the Mill is reused for Land Applications (LA). Before being channeled to LA, the liquid waste is first managed at the WWTP with the aim that the quality of the liquid waste flowing to LA is in accordance with the provisions.	
	Domestic Waste	
	Domestic waste generated from housing and offices will be disposed of in landfills. Afterward, liquid waste generated housing complex and office be managed on septic tanks.	
	Observed during field visit at housing complex, there is not found garbage scatter on the ground.	
7.3.2	 Unit of certification already has a document on the Results of Monitoring the Implementation of Waste Management in accordance with the applicable procedures, contained in several documents including: Documents on Results of Identification of Hazardous Waste Sources for the 2024 period which provide information regarding 	Yes
	 the sources of waste that have been identified by the company. Documents in the Balance Sheet and Logbook for the period 2023- July 2024 which show records of incoming and outgoing waste data. Waste is recorded and archived in accordance with the type, characteristics, time it is produced and the delivery to 	





- collectors, and must submit an official report to the relevant government agency.
- OHS Completeness Monitoring Document which is carried out periodically with a checking period in July 2024 which informs the condition and completeness of emergency response facilities in storage areas such as first aid kits, eye wash and shower, fire extinguishers, spill kits and alarms. The monitoring results show that all equipment is in good condition.

Based on the verification results of field observations at Lada Estate and Runtu Estate, it shows that the storages has been completed with procedures following permits, such as:

- Installed with OHS equipment such as alarm, spill kits, fire extinguisher, shower, eye wash and first aid kit.
- All waste stored according to type and characteristics accompanied by a label and symbol on the packaging.
- Record every incoming and outgoing waste movement.
- Submitting waste management reports to relevant agencies.
- Types of waste that are allowed to be stored are used lubricating oil, used hazardous packaging, used LED lamps, medical waste, waste from laboratories containing hazardous waste, and used rags originating from their activities.
- The building and design comply with applicable requirements and are far from flood-prone areas.

From the results of a document review by comparing balances and logbooks, it can be seen that the submission of waste to storage until July 2024 has been appropriate and there is no difference in the amount submitted. Thus it can be concluded that there are no recording errors and discrepancies based on the balance sheet, logbook and festronik documents, this shows that the company has properly documented the storage and handling of waste. Example of recording and documenting waste transport in the form electronic manifest evidence, can be seen in the table below:

The company transported LB3 to the carrier on May 09, 2024 with carrier vehicle number KH 8716 GN by PT Semesta Langgeng Sentosa. The waste transported is:

- 0.075 tonnes of laboratory waste containing hazardous and toxic materials with manifest KLHK-1723517525.
- Clinical waste of 0.006 tonnes with manifest KLHK-1723517624.
- Used lubricating oil of 0.016 tonnes with manifest KLHK-1725420438.

The results of interviews with warehouse staff found that they understood how to handle hazardous waste based on company

Page 99 of 136



7.3.3	procedure. Based on field observations at licensed waste storage in Lada and Runtu Estate, storage has been installed with as symbols, first aid kits, emergency shower, item storage according to permits, monitoring document and so on. Based on explanation above so it can be concluded that the company carries out waste disposal according to procedures that are fully understood by workers and managers. Observed during field verification at the housing complex of Lada POM, Lada Estate and Runtu Estate, there was not found tracing of fire for burning garbage.	Yes
7.4.1	The company SOP for Good Agricultural Practices included managing soil fertility which are listed in SOP on Fertilization Work Instructions with No. SSS-EST-08 where the SOP explains all fertilization activities taking into account environmental, social, work safety aspects and in accordance with technical instructions. The SOP also explains the purpose of harvesting in accordance with the objectives of environmental and social management. The unit of certification has implemented procedures to optimize production, such as: Regular sampling of soil and leaves to ensure that the elements needed by plants can produce optimally. The results of the soil and leaf analysis tested will be the basis for determining the dosage of fertilization in each estate. Fertilization activities prioritize the principles of right time, right target, right dose and right application. In addition, marginal soils are given extra fertilization in the form of empty fruit bunches at a dose of 250 kg/stand. Application of palm oil liquid waste (POME) to increase soil fertility. Maintenance of ground cover plants to reduce evaporation (to maintain soil moisture). For example, planting Leguminosae (Mucuna bracteate, spraying is always conveyed at morning apples so as not to spray the plants. The company's commitment to no longer use paraquat. Based on information from managers and staff, this shows the company's commitment to support the RSPO guidelines on reducing/not using class 1A and 1B herbicides. Monitoring of SOP implementation, among others, is carried out through an internal audit mechanism. Observations in the Land Application in Lada Estate area it was found that POME had been applied to the land in accordance with the permits and recommendations held. This activity demonstrates the company's efforts to increase soil organic content by increasing soil nutrients needed by roots, especially on marginal soils and preventing overflow/spillage into the field.	Yes

Page 100 of 136



	There is agronomist report to monitor yield/ha vs Fertilizer used as sighted based pm fertilizer recommendation. Based on the results of interviews with manuring workers, it is known that workers have understood the implementation of manuring activities, workers also explained that fertilization is not carried out in water bodies because it can pollute the environment. The results of interviews and document verification, it shows that the empty fruit bunches are used to substitute fertilizer by applying it to the land. The company also utilizes liquid waste which is used to substitute fertilizer into the land through Land Application. All of the waste is utilized and data on its use is recorded in detail and traceable. Based on information from interviews and document reviews, there are already available nutrient recycling strategies, which can include	
7.4.2	recycling empty fruit bunches, Mill liquid waste, palm oil residue, as well as optimizing non-organic fertilizers. The company can show the SOP on Fertilization Work Instructions with No. SSS-EST-08 where the SOP explains all fertilization activities taking into account environmental, social, work safety aspects and in accordance with technical instructions. The SOP also explains the purpose of harvesting in accordance with the objectives of environmental and social management. The soil fertility management strategy carried out by the certification unit includes implementing the following fertilization: Leaf Analysis Analysis of Lada Estate Leaves, issued by the Research Department, Lada Research Laboratory. The parameters analyzed include N, P, K, Mg, Ca, B, Cu, Zn, Fe, and Mn.	Yes
	 Analysis of Runtu Estate Leaves Estate. The parameters analyzed include N, P, K, Mg, Ca, B, Cu, Zn, Fe, and Mn. Soil analysis Soil Analysis of Lada Estate Number E.001/FR-R&D-RSL-42/II/2020, dated February 3, 2020, issued by the R&D Laboratory of PT Gunung Sejahtera Ibu Pertiwi for a total of 32 samples The parameters analyzed included pH, organic matter, Ca, Mg, K, and Na. Soil Analysis of Runtu Estate Number 339/FR-R&D-RSL-42/X/2019 dated October 18, 2022, issued by the R&D Laboratory of PT Gunung Sejahtera Ibu Pertiwi for a total of 70 samples The parameters analyzed included pH, organic matter, Ca, Mg, K, and Na. 	

Page **101** of **136**



	The unit of certification also utilize Mill waste for fertilizer. Data on the recapitulation of solid waste utilization for fertilizer for the period January – July 2024 are as follows: • Empty fruit bunch utilized 20,679.660 MT (Lada Estate) and 6,465.300 MT (Runtu Estate). • The liquid waste used is 140,864.86 m3	
	Based on the results of interviews and document verification, it shows that the empty fruit bunches are used to substitute fertilizer by applying it to the land. The company also utilizes liquid waste which is used to substitute fertilizer into the land through Land Application. All of the waste is utilized and data on its use is recorded in detail and traceable.	
	Based on information from interviews and document reviews, there are already available nutrient recycling strategies, which can include recycling empty fruit bunches, Mill liquid waste, palm oil residue, as well as optimizing non-organic fertilizers.	
7.4.3	The organization applied POME/Effluent/Liquid waste and ash of EFB as a nutrient strategy to manage soil fertility and minimize negative impact anorganic fertilizer to the environment.	Yes
	The company also has a nutrient recycling strategy which includes the utilization of empty oil palm and the utilization of of liquid waste for the January-July 2024. • POME was applied by SSS POM with total debit out Jan to July 2024: 152,031.63 M3. • EFB was applied by SSS POM: example for July 2024: 31,043.72MT with dose 35 ton/Ha (Based on document Waste Utilisation January to July 2024→ Despatch EFB for Estate and Masyarakat).	
7.4.4	The company shows the recording of the recommendation report and the realization of fertilization for the January – June 2024 period is in accordance with the dose. For example, in the Fertilization Recommendation and Realization Report for the period January – June 2024.	Yes
	From the results of document verification of the realization of fertilization, it was concluded that the realization of fertilization was in accordance with the recommendations and the fertilization plan for 2024 had been completed by the company as a whole based on the fertilizer recommendations set and had 1 more rotation.	
7.5.1 (C)	The company has a map of Soil Type Estate with a scale of 1: 50,000 which was made by the PT SSS GIS team in 2016. The map explains the types of soil contained in the company's operational area are	Yes

Page 102 of 136



	inland soil, Flood Prone Area, Inland Sandy Soil, and peat. Types of soil that are classified as marginal are peat, flood areas, and acid sulfate. Based on the topographic map made by the GIS team of PT Surya Sawit Sejati with a scale of 1: 120,000, it is known that the dominant operational area of the company is flat bumpy. There are no steep slopes that require monitoring and special treatment when it is decided to plant. Based on the results of field visits and document studies, it is known that there has been no replanting activity in the management unit area.	
7.5.2	The company has a map of Soil Type Estate with a scale of 1: 50,000 which was made by the PT SSS GIS team in 2016. The map explains the types of soil contained in the company's operational area are inland soil, Flood Prone Area, Inland Sandy Soil, and peat. Types of soil that are classified as marginal are peat, flood areas, and acid sulfate. Based on the topographic map made by the GIS team of PT Surya Sawit Sejati with a scale of 1: 120,000, it is known that the dominant operational area of the company is flat bumpy. There are no steep slopes that require monitoring and special treatment when it is decided to plant. Based on the results of field visits and document studies, it is known that there has been no replanting activity in the management unit area.	Yes
7.5.3	The company has a map of Soil Type Estate with a scale of 1: 50,000 which was made by the PT SSS GIS team in 2016. The map explains the types of soil contained in the company's operational area are inland soil, Flood Prone Area, Inland Sandy Soil, and peat. Types of soil that are classified as marginal are peat, flood areas, and acid sulfate. Based on the topographic map made by the GIS team of PT Surya Sawit Sejati with a scale of 1: 120,000, it is known that the dominant operational area of the company is flat bumpy. There are no steep slopes that require monitoring and special treatment when it is decided to plant. Based on the results of field visits and document studies, it is known that there has been no replanting activity in the management unit	NA

Page 103 of 136

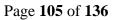


	area.	
7.6.1 (C)	The company has a map of Soil Type Estate with a scale of 1: 50,000 which was made by the PT SSS GIS team in 2016. The map explains the types of soil contained in the company's operational area are inland soil, Flood Prone Area, Inland Sandy Soil, and peat. Types of soil that are classified as marginal are peat, flood areas, and acid sulfate.	Yes
	Based on the topographic map made by the GIS team of PT Surya Sawit Sejati with a scale of 1: 120,000, it is known that the dominant operational area of the company is flat bumpy. There are no steep slopes that require monitoring and special treatment when it is decided to plant.	
	Based on the results of field visits and document studies, it is known that there has been no replanting activity in the management unit area.	
7.6.2	The company has a map of Soil Type Estate with a scale of 1: 50,000 which was made by the PT SSS GIS team in 2016. The map explains the types of soil contained in the company's operational area are inland soil, Flood Prone Area, Inland Sandy Soil, and peat. Types of soil that are classified as marginal are peat, flood areas, and acid sulfate.	Yes
	Based on the topographic map made by the GIS team of PT Surya Sawit Sejati with a scale of 1: 120,000, it is known that the dominant operational area of the company is flat bumpy. There are no steep slopes that require monitoring and special treatment when it is decided to plant.	
	Based on the results of field visits and document studies, it is known that there has been no replanting activity in the management unit area.	
7.6.3	The soil type maps and topographic maps containing information on soil classification, texture, drainage, limiting factors and suitability information for the development of oil palm plantations have helped companies to manage blocks, roads, drainage, bridges, etc. The Unit of Certification also has a Road Maintenance Program that is equipped with adequate infrastructure and facilities to carry out the work. According to the results of the field visit, roads are in good condition and harvested FFB is transported smoothly to Mill.	Yes

Page 104 of 136



7.7.1 (C)	Based on AMDAL document (2008) and HCV Assessment Report (2013), there is information that all area of the organization consists of mineral soil (<i>Podzolic Merah-kuning, Regosol, Alluvial</i>). Based on the results of the study of the area statement document and interviews with management, it was found that the company did not plant in peat areas after November 15, 2018. As information from the distribution of planting years, it is known that the last planting is in 2009. There is no additional planting after the 2009 period both in the mineral area, especially in the peat area.			NA
7.7.2	The company has second submission a procession of RSPO (ghg@rspo.org) on Januari 13, 20 entire peat area in PT Surya Sawit Seja Estate) including planted area, unplanted peat area is 417.11 Ha, of which 92.20 Estate and 320,85 Ha planted area in Ruhcv (Rehabilitation). More detailed information can be found in Summary of estates containing peat	peat inventory re 123 which has ex ati (Lada Estate ad area and HCV 6 Ha planted and untu Estate, and	xplained the and Runtu V. The total rea in Lada I 137.15 Ha	NA
	Peat of unplanted- infra, building, etc Peat of unplanted- Other HCV, HCS, Conservation	0 137.15		
7.7.3 (C)	The company shows records of arrange layer, including the following: The mechanism for regulating the layer is contained in document Nu March 31, 2014 concerning Peat 0 brief, the document explains the swater management. Based on a study of the distrib subsidence markers, piezometers water levels, it is known that th subsidence markers, 4 piezometers water gates. Based on the results of field v piezometer, water gate/stop bund, block E18 Runtu Estate, it is known good condition. Based on the results of interview	subsidence of to imber SSS-EST- Cultivation Mana subsidence of po- ution map doc s, water gate/s e company alro s, 6 water level s isits (subsidence water level), for that the infrast	he peat soil 19 effective igement. In eat soil and uments for top bunds, eady has 4 ticks, and 8 e markers, example in ructure is in	Yes





7.7.4 (C)	 officers, it is known that these personnel understand and can explain the mechanism for regulating the subsidence of peat soil layers. The company shows records of peatland management including: Subsidence monitoring for the 2022 - 2024 period, it is known that the decrease in the peat soil layer in the December 2023 period has an average decrease in peat subsidence of 3.10 cm/year (17 month in December 22, 2023) → Probe 2 Lada Estate. an average decrease in peat subsidence of 2.47 cm/year (17 month in December 22, 2023) → Probe 1 Lada Estate an average decrease in peat subsidence of 2.47 cm (17 month in December 22, 2023) → Probe 2 Runtu Estate an average decrease in peat subsidence of 1.85 cm/year (17 month in December 22, 2023) → Probe 1 Runtu Estate. Piezometer monitoring for the 2022 - 2024 period, it is known that the peat groundwater level in the August 17, 2024 period is 71 cm (Piezometer 1 Lada Estate). Based on the results of the monitoring review above, it can be concluded that (subsidence, ground water level, high water level) are in accordance with statutory regulations. The company characterist for levering the peat in accordance with statutory regulations. 	Voc
7.7.4 (C)	 The company shows records of arrangements for lowering the peat layer, including the following: The mechanism for regulating the subsidence of the peat soil layer is contained in document Number SSS-EST-19 effective March 31, 2014 concerning Peat Cultivation Management. In brief, the document explains the subsidence of peat soil and water management. Based on a study of the distribution map documents for subsidence markers, piezometers, water gate/stop bunds, water levels, it is known that the company already has 4 subsidence markers, 4 piezometers, 6 water level sticks, and 8 water gates. Based on the results of field visits (subsidence markers, piezometer, water gate/stop bund, water level), for example in block E18 Runtu Estate, it is known that the infrastructure is in good condition. Based on the results of interviews with water management officers, it is known that these personnel understand and can explain the mechanism for regulating the subsidence of peat soil layers. The company shows records of peatland management including: Subsidence monitoring for the 2022 - 2024 period, it is known 	Yes

Page 106 of 136



	that the decrease in the peat soil layer in the December 2023 period has an average decrease in peat subsidence of 3.10 cm/year (17 month in December 22, 2023) → Probe 2 Lada Estate. • an average decrease in peat subsidence of 2.47 cm/year (17 month in December 22, 2023) → Probe 1 Lada Estate • an average decrease in peat subsidence of 2.47 cm (17 month in December 22, 2023) → Probe 2 Runtu Estate • an average decrease in peat subsidence of 1.85 cm/year (17 month in December 22, 2023) → Probe 1 Runtu Estate. • Piezometer monitoring for the 2022 - 2024 period, it is known that the peat groundwater level in the August 17, 2024 period is 71 cm (Piezometer 1 Lada Estate).	
	Based on the results of the monitoring review above, it can be concluded that (subsidence, ground water level, high water level) are in accordance with statutory regulations.	
7.7.5 (C)	Based on the results of interviews with management and review of documents regarding the replanting plan, there will be no replanting activities on peatlands for the next 5 years. The plan of replanting start in 2030.	Yes
7.7.6 (C)	The management unit can show monitoring documents for the management of peat areas in the company's area such as water level measurements, piezometer calculations and subsidence measurements. In addition, for peat areas in areas that are not open, the management unit maintains the area as a conservation area.	Yes
7.7.7 (C)	The management unit can show monitoring documents for the management of peat areas in the company's area such as water level measurements, piezometer calculations and subsidence measurements. In addition, for peat areas in areas that are not open, the management unit maintains the area as a conservation area.	Yes
7.8.1	Geographically, PT Surya Sawit Sejati is located between 4 (five) rivers, namely the Pemalingan River, Rangit River, Kumai River, and Biru River. The company has a surface water quality monitoring program. From the documents shown, it is known that several activities have been carried out by the management unit to manage water and maintain water sources, including: • Report on the rehabilitation of the riparian area, carried out in the riparian area that has been planted, among others; planting and maintenance of local forest plants. • HCV management report, related to monitoring the markings of the boundaries of the river riparian area by painting on the oil palm trees/trees of the outermost border of the river riparian and not spraying pesticides in the riparian area	Yes

Page 107 of 136



- of erosion potential.
- Documents of land application reports, as evidence of records of the reuse of POME from factories for land application activities, the implementation of efforts to avoid disposing of POME into water bodies
- Evidence of socialization to workers and the community regarding conservation area management.
- Conduct surface water quality sampling with reference to PP No. quality standard. 22 of 2021 attachment IV which is carried out periodically every 6 months at five (5) sampling points include; Pemalingan River, Rangit River, Kumai River, Biru River, and Rangit sub-River.

The organization has defined water management plan as sighted in the document title "Rencana Pengelolaan dan Pemantauan Lingkungan Hidup (RKL-RPL)", among others:

- Demarcate riparian buffer with signboards, poles or marking of palm trunks,
- apply fertilizer and pesticides as per recommendation to minimize leaching on the ground,
- o not apply pesticides within buffer zone,
- prohibit to dump waste/garbage into the river,
- o prohibit to poisoning fish,
- prohibit to wash equipment like pesticides sprayer,
- o conduct regular monitoring surface water quality every semester.

Field inspection at Kumai River and Rangit River, the riparian was demarcated with mark "red paint" on palm trunks, vegetation grow up naturally at river bank, and no indication of pesticides application.

Results of testing the surface water quality of Lada Estate and Runtu Estate

The company has a surface water quality monitoring program that is conducted every semester by a KAN-accredited laboratory (LP-1099-IDN) on January 22 , 2024 by Persada Laboratories . The monitoring location is on a river for the scope of the company's operational area at Lada Estate , namely the Pemalingan River, Rangit River, Kumai River, and Biru River (Hulu and Hilir) and at Runtu Estate namely the Arut river Currently the company is testing surface water using quality standards that refer to PP 22 of 2021 Class II. The results of the test will then be reported to the relevant Office through the RKL-RPL Report every semester.

Page **108** of **136**



7.8.2 (C)

There are several tests for environmental parameters such as testing river water which exceeds the PP 22 of 2021 Class II quality standards, namely for COD and PH parameters. Based on the results of testing the quality of river water by an environmental laboratory accredited by KAN, it is known that there are test results that are above the quality standard used, namely PP RI No. 22 of 2021, namely TDS in Rangit River, based on interviews with management this is influenced by fluctuations in community activities and operations around company.

For example, Pemalingan River, result on parameter pH, BOD, COD, Total solid suspension (TSS) and fat and oil, is presented in the following Table:

Parameter	Threshold	Upstream	Downstream
pН	6 – 9	7.34	7.56
BOD (mg/l)	3.00	16.50	6.90
COD (mg/l)	25.00	39.00	8.30
TSS (mg/l)	50.00	40.00	20.00
Oil and fat (mg/l)	1.00	<0.50	<0.50

Based on the Table above, it could be concluded that value of BOD and COD parameters were above threshold since on the upstream but significantly decreased on the downstream. Thus, it was indicating that mill and estate operational activities has not contribute to negative impact on environment parameter.

The company has carried out an evaluation by protecting and maintaining the riparian area by replanting forest trees on the left and right of the river. Based on the results of interviews with the surrounding community, information was also obtained that there was no environmental pollution by the company. In addition, the results of interviews with the Kotawaringin Barat Regency Environmental Service also explained that the company had carried out environmental management and monitoring and reported the results of the implementation of environmental management and monitoring to the Environmental Office.

Selected workers were interviewed during field visit, they informed that clean water was provided by company. The workers also informed easily to get water from nearest shop.

The company has procedure for Riparian Management with number SOP Number SSS-EST-25 dated 24 November 2017 which was

Yes

Page **109** of **136**



	approved by the President Director. This procedure aims to ensure the sustainability of the functions of water bodies (rivers, reservoirs and swamps) within the location of plantation activities and refers to applicable laws & regulations are: • Determination of River Boundary Width. • Installation of signs on the river border line • Marking of locations where oil palm has been planted using paint. • Cultivation activities in river border areas • Rehabilitation of riparian areas. PT Surya Sawit Sejati carries out several management activities to improve river water quality, namely by: • Ensuring that the Riparian Protection is carried out in accordance with established procedures.	
	 Carry out riparian maintenance and rehabilitation by planting various types of trees that are native to the area or other fast- growing plants. Carry out rehabilitation program in conservation areas. Maintenance of drainage canals around estate blocks, so that these channels are not clogged and do not drain directly into rivers or water bodies. Conduct regular river water quality tests according to the applicable parameters, and report them to the authorized agency. Supervision of the use of fertilizers and pesticides in the field, consistently according to recommendations regarding the type, dosage, and method of application. There is a sign to prohibited disposing of domestic waste in river areas. 	
7.8.3	Based on the results of interviews with the Environmental Service regarding the management of liquid waste at the WWTP, there were no issues related to environmental pollution. The results of interviews with the community from the villages around the company also stated that there was no pollution from the liquid waste produced by the company. Management of POME from oil palm processing from with totaling 7 waste ponds with a multifeeding system that is by feeding simultaneously evenly. Company has permit document from DPMPTSP Kotawaringin Barat Regency No. 503/103/LH/DPMPTSP.D dated May 13, 2019 valid until March 28, 2024. Based on <i>PermenLHK No.5 tahun 2021 tentang Cara Penerbitan Persetujuan Teknis Dan Surat Kelayakan Operasional Bidang Pengendalian Pencemaran Lingkungan pasal 53</i> states that companies that already have a permit for the disposal and/or utilization of wastewater are declared to remain valid until the end of the business activity.	Yes

Page 110 of 136

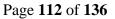


	Before being used, the POME is processed until it reaches the standard for wastewater utilization in oil palm plantations, with pH 6-9 and BOD 5000 mg/l. POME is managed in accordance with applicable national regulations, according KepmenLH No.28 & 29 of 2003 regarding Technical Guidelines for Assessment of Wastewater Utilization from Palm Oil. Wastewater from the WWTP pond outlet is then pumped and used as a designated location for the use of waste water on the land (Land Application) with 191.16 ha in blocks 17, 18, 19, 25, 26, 27, 29, 30, 31, 32, 33 and 34 in division I Lada Estate. This application dose covers the entire liquid waste generated by the factory, so there is no discharge of POME into water bodies. Based on these data, and when compared with the responsibility contained in the Permit, indicates that the company has complied with. Based on testing result, the discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), still under threshold limit refer to the Environmental Minister Decree No.28/MENLH/2003 where the sample taken at outlet WWTP before pumped to LA. Field inspection at Block 17 Div I , it was confirmed that mill effluent discharged to permitted area. Based on the results of interviews with the Environmental Agency of Kotawaringin Barat Regency regarding the management of POME at the WWTP, there were no complain related to environmental pollution. The results of interviews with the representative of Runtu Village around the company also stated that there was no pollution occur.	
7.8.4	The certification unit already has a groundwater utilization permit based on decree head of Minister of Public Works and people Housing No. 1085/KPTS/M/2024 concerning Surface Water Utilization Permit to PT Surya Sawit Sejati dated 31 May 2024 which is valid until 31 May 2029. Explained in the permit that the maximum quota for water intake discharge is 222.3 m3/day taken from 1 intake location at Kumai River, SP 6, Pangkalan Lada District, Central Kalimantan. Water usage was monitored using flowmeter that installed at water intake. Based on field verification, the flow meter was function normally.	Yes
	The company has recorded water usage for the period January – July 2024. The company can also show examples of evidence of water recording from the flowmeter in the PKS WTP for the FFB	

Page 111 of 136



	2024 of 171,772 M3 The company can a for the period Ma Regional Revenue	3. Also show proof of s y 2024 to the Kali Agency on 12 June 2 e surface water tax	f 322,766 M3 an Jan urface water levy payr mantan Tengah Pro 2024, and the paymen bill from the Riau Pro	ments ovince ot is in	
7.9.1	Plan for eficiency of fossils fuels usage and to optimize renewable energy has been defined as sighted in the GHG management plan, document title "Identifikasi dan Program Mitigasi Gas Rumah Kaca" among others equipment maintenance (heavy equipment, genset, vehicle), road maintenance, control equipment operation as needed to minimize fossil fuel consumption, and use of fiber & shells for boiler fuel.				Yes
	and to optimize mor by recording docum from the rest of th boiler purposes in	nitored and renewab nents on the applica e mill production p January-July 2024.	uels to increase the eff le energy. This can be tion of the use of shell rocess as renewable f Currently, the compai city- producing biogas.	proven ls, and uel for	
	energy used versus	product produce du	_	wable	
	Unit Lada POM	Fossil fuel use Ltr/ tCPO or tFFB 624.77	Renewable Energy Use Fiber: 17,300.75 MT Shell: 7,698.47 MT		
	shows that all soll substitute diesel fu detail and traceable has saved 6.78% of	id waste in the for lel, this utilized and e. From data shows, of diesel fuel, of the	nd document verificati m of shells and is us the usage data record it is known that the con total diesel that should iency produced from u	ed to led in npany have	
	use of fossil fuels ir others by carrying	n the transportation out regular mainte analyzing fuel u	improve the efficiency area (use of vehicles), enance to reduce inco use by selecting e	among	
7.10.1 (C)	valuation by doing	GHG inventory with	source identification an in the scope of Lada M tu Estate) monitored th	lill and	Yes



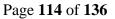


	Palm GHG Calculator 4.0 and the summary result reported and accessible to public in RSPO website. The company has identified the significant GHG emissions, including: land used change, POME processing, used of fertilizers and pesticides, used of fossil fuels for operations and transportation.	
	The organization has implemented and evaluated the GHG mitigation plan 2023. The result of evaluation become feedback to define the GHG mitigation plan 2024 such efficiency of fossil fuel used and fertilizer application.	
	Unit of certification also made several mitigations plans to control the impact among GHG emission, such as: the right dose of fertilizer uses and application as recommended, reduction of reuse and recycling actions, restrictions on electricity use, transportation and machine maintenance, and periodic air quality tests.	
7.10.2 (C)	Based on Hectarage statement 2024 and interviewed the Management, the organization currently does not carry out or propose development area for oil palm cultivation.	Yes
	No new planting activities above 15 November 2018, the company did not conduct new land clearing activities or development of operational areas. Based on the results of the document review, it was found that there were no new plantings above 2014 nor replanting at PT Surya Sawit Sejati. The oldest planting year is on 2004.	
7.10.3 (C)	The organization conducts regular monitoring every semester to measure the quality of emission. The result of monitoring was included in the RKL-RPL implementation report, submitted to <i>DLH Kabupaten Kotawaringin Barat</i> . The last was for period January – June 2024.	Yes
	The company has identified pollution sources at POM and Estate, the document informs sources (stations/activities), sources of pollution and emissions, impacts (humans, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, steam and chemical pollution, from the engine room it produces pollution in the form of noise	
	Based on test result in June 2024 that conducted by Persada Laboratory, compare to national regulation is still under threshold limit (ref. report No. 6010/VI/2024 dated 21 June 2024, report No. 5843/V/2024 dated 28 May 2024).	
7.11.1 (C)	Based on the results of verification of legality documents and area statements, interviews with management and relevant stakeholders and observations of the company's operational areas, it was found	Yes

Page 113 of 136

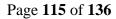


	_	
	that there were no new plantings or replanting areas. The oldest planting year is 19 years old (planting year 2004). In addition, the company has Environmental and Biodiversity Policy dated 01 October 2022 regarding commitment not to open burning, including in land preparation.	
7.11.2	The unit of certification has established fire prevention and control measures for the lands it manages directly by showing evidence that there are land fire prevention and control activities, which include; • The existence of document procedure for land fire control • Organizational Structure Team: consists of a chairman, secretary, person in charge (prevention, suppression and logistics) and 3 fire teams consisting of main team (1 team of 15 personnel), support team (2 teams of 30 personnel), and assistance team (4 teams of 40 personnel) each estate (Runtu and Lada Estate). • Equipment, Facilities, and Infrastructure In its implementation, land fire prevention and control activities are supported by facilities and infrastructure, including those listed in the simple fire extinguisher and equipment monitoring document, year updated on 2023. Based on the document, it is known that the facilities and infrastructure owned have referred to the Ministry of Agriculture Number 5 of 2018. From the results of field observations in the fire department warehouse in Lada Esatate, it is known that the facilities and infrastructure owned are in good condition and suitable for use. • Budget The company also has a budget plan to continue completing the needs of team personnel who stated in the 2024 budget. For example, includes a budget related to procurement, repair and maintenance of firefighting facilities and infrastructure in each estate. For example; Fire Patrol – Provision and Training budget year of 2023 for Lada and Runtu Estate. • Fire Drill Training Conducted on August 02, 2024 at the Runtu Estate attended by firefighting team (8 participants). • Reporting Document report on the preparedness of systems, facilities and infrastructure for controlling fires on PT Surya Sawit Sejati's plantation land which was reported on November 2023 to the Agriculture Service, Environment Service, and Kotawaringin BaratRegency Government. • Fire-Prone Areas (Hotspots) Monitoring. The company can show a recording of the	Yes





	Runtu Estate) from document in 2023-2024. The results of the inspection of the document revealed that there were fire incidents in the company's operational areas at November 07, 2023 in block F2 Kelampai (Runtu Estate) and has been successfully extinguished. The fire was caused by the burning of land by the community to clear the land. In addition, as an effort to prevent fires, the company also puts up warnings indicators related to fires, prohibits burning garbage and so on.	
7.11.3	The organization has enggaged to adjacent stakeholders on fire prevent and control, by conducted training on August 24, 2024 which was attended by 32 participants, of which people were members of the PT SSS fire tim and village community. The organization demonstrates evidence of fire prevention as follows the company showed examples of socialization of policies, one of which is the fire anticipation policy and the prohibition of burning in plantation operations. The company also carries out regular outreach to prevent forest and land fires in the PT SSS, both to employees and the surrounding community. Socialization to employees is carried out during the morning roll call in each division which is delivered by the Division	Yes
	assistant. Meanwhile, outreach to the community is carried out by coordinating with stakeholders and installing signs and warnings regarding land fires. Based on the results of interviews with village representatives and with workers, it is known that the company has provided outreach regarding fire prevention.	
7.12.1 (C)	The unit of certification conducts land clearing without prior HCV assessment. However, it has been preceded by an AMDAL study in 2007. From the document review of the area statement analysis, it shows that the company carried out the planting in 2007- 2009 and the HCV study in 2014. In this regard, the company has a LUCA obligation.	Yes
	The LUC Analysis study was conducted by Rodziah binti Hashim on May 9, 2014. The study area is 18,743.74 for 4 estates, while the scope of certification is only 6.717.62 ha. From the results of the study, it was found that raw liability covering an area of 10,699.5 ha, and final conservation liability 2,508.76 ha, the document has been verified by Dr. Ismail Parlan with pass status. The analytical method for LUCA is image analysis and AMDAL conducted by Green Harvest Environmental Sdn Bhd (Kumai Estate, Lada Estate and Runtu Estate).	





	On October, 4th 20, RSPO the Compensation Plan is approved by the Compensation Panel, with follow up action points. The company has shown supporting documents consist of: 1. Annex 7 Compensation Concept Note on Population Management of the endangered species. UP/PTSSS submitted a self-declaration liability and the final conservation liability amounted to an area measuring 2,508.76 ha. 2. Annex 8 Compensation Plan • Lada Estate. - Rehab Riparian (remediation) 74.46 ha. - Rehab Floodplain 50.8 ha. - Non-oil Palm Plantings on steep slope. • Runtu Estate - Rehabilitation Riparian (remediation) 15.59 ha. - Rehab Floodplain (Freshwater swamp 133.2 ha dan peat swamp 205.3 ha). - No oil palm plantings on steep slope. 3. 25 years' budget and timeline, and clarification needed for compensation plan final on 27 September 2019. 4. RaCP Quarter Report. Orangutan research as an action point of the remediation and compensation program carried out by PT SSS, including by: • Socialization orangutan survey plan on 23, 24, 30 & 31 May 20024 with the village leader from Sungai Rasau, Sungai Pulau, Karangsari, Kumai Hulu, Sungai Sekonyer and Mulya Jadi. Total participants 28 persons.	
7.12.2 (C)	There is no land clearing since 15 November 2018. Unit of certification has identified the protected area of PT Surya Sawit Sejati which is located in Kotawaringin Barat Regency, Kalimantan Tengah Province. The HCV Assessment conducted in 9 May 2014, made by the biodiversity internal team, created a work program to complete the results of the HCV identification in 2008, by delineating the HCV area, a baseline study and also conducting liability disclosures to the RSPO regarding the program for remediation and compensation. The study was conducted by the Biodiversity Division of PT SSS	Yes
	based on Decree No: 001/SSS/KONSERVASI/V/2010 concerning Designation of Conservation Areas on 10 May 2010. From the results of the study, the identification of protected areas was obtained according to the audit scope data (total 6,717.62 ha) with the following details	





	Area	Lada	Runtu Estate	
		Estate(Ha)	(Ha)	
	HCV Riparian	122.56	2.36	
	HCV-Cemetery Area	0.03	-	
	Conservation area (self-	632.93	1143.85	
	declared)			
	Conservation area-	31.32	604.69	
	rehabilitation (self-declared)			
	Sub Total	836.84	1,750.82	
	Grand Total	2,587.66		
	Based on the results of the doc management, it was found that	there was no	new clearing at PT	
	SSS since 15 November 2018, s	•	•	
	be concluded that the company			
7 12 2 (0)	as protected areas and high cor			NIA
7.12.3 (C)	This requirement is not relevant on the RSPO website it is kn Landscapes and High Forest established by the RSPO. So th assessed.	own that the Cover Countri	High Forest Cover es have not been	
7.12.4 (C)	The company already has an period based on the evaluation HCV management realization evaluated annually. The plan monitoring, timelines and implementation. The HCV management plan, including: Biodiversity database Monitoring of biotic and measurement of water quality and rehability nurseries by developing sources, and management and profusions. Area enrichment and profusions of intrusive in Rehabilitation and enrich Build and enrich potential Control of hunting and illustrations.	n results of the n. The HCV n contains m the person anagement mand abiotic parality and microtation of native nurseries (strot) tection: t (delimitation of wildlift al	e previous period's program will be anagement plans, in charge of atrix describes the trameters, through po-climate e tree species ructure, seed in, patrolling, and is)	Yes

Page **117** of **136**



	- Community outreach and involvement - Encouraging communities to utilize non-timber forest (NTFP) products in conservation areas - Protect the preservation of historical - cultural sites with relevant stakeholders	
	The company has also conducted an annual review of the management of High Conservation Value Areas which was conducted on 26 July 2023. This activity was carried out to analyzed opportunities and challenges to the identified potential HCVs with the hope that they will become input for the next HCV management plan. This activity was carried out by involving stakeholders such as the surrounding village community and employees.	
	Management plan has been developed with participatory manner through stakeholder meeting held every once year. The last stakeholder meeting held in 20 July 2022 and 26 July 2023. HCV monitoring is periodically evaluated by unit of certification every 5 years and is used as a reference as a management plan for HCV management. The management plan is implemented effectively based on the results of monitoring from the previous period. All evaluation results will be reviewed and will be adjusted to the HCV management program in the 2024 period.	
7.12.5	Based on the results of the document review and interview with management, it was found that there was no new clearing nor replanting period.at PT Surya Sawit Sejati Tunggal since 15 November 2018. The oldest planting year was 2004. Community involvement in the management of HCV areas, for	Yes
	example, can be proven through socialization of the forest area of Runtu Village, Arut Selatan District in 2023 on 20 January 2023 with participants in the socialization of land cultivators on maps 7A and 7B of Runtu Estate. This activity is one of the stages of completing the no land use right in the area with forest to be conserved covering an area of 175 ha as a form of PT SS' commitment to forest protection and by involving the community through FPIC.	
	The people who attended this activity were the people/owner/cultivated the land in the Tajur Beguruh, Tajur Kembayau/Naning, and Darat Runtu areas who were under the Runtu Estate plantation permit, totaling of 30 participants.	
	The follow-up plan for this meeting is:	

Page 118 of 136



•		
	 Verification of land ownership documents in accordance with the SOP for Land Completion Checking the land of each land owner and cultivator FGD groups of land owners/cultivators 	
7.12.6	The company has a policy on RTE species protection as sighted in the document title as fallow: SOP for Inventory of Flora with No. SSS-EST-17 dated October 26, 2013 as a reference for the introduction of flora species in the area of PT Surya Sawit Sejati – United Plantation SOP for Fauna Identification with No. SSS-EST-18 dated October 26, 2013 as a reference for identifying animals in the PT Surya Sawit Sejati – United Plantation area SOP for Protection of Flora and Fauna with No. SSS-EST-25 dated January 20, 2011 as a guide to prevent plant and animal species from being endangered, maintain genetic purity and diversity of plant and animal species, and maintain ecosystem balance and stability. SOP for Patrol and Work Safety in Conservation Areas with No. SSS-EST-24 dated January 20, 2011 as a guide in maintaining and conserving conservation forests, especially habitats for endangered animals, noting encounters with flora and fauna in conservation forests, and identifying disturbances that threaten the habitats of endangered animals. The company routinely conducts outreach to the community and workers in the company regarding the existence of endangered plants and animals, which is carried out simultaneously with the socialization of HCV areas, for example: Minutes of HCV outreach including the presence of important species which was carried out on 7 August 2024 to 130 employees across all divisions. Minutes of socialization of HCV and important species which was carried out on 24 August 2024 which was attended by 32 local communities Based on the results of interviews with harvest and spray officials at Lada and Runtu estate, it is known that the company prohibits workers from keeping protected animals and plants and is prohibited from catching, hunting, and killing animals and is prohibited from destroying HCV areas.	Yes
7.12.7	Based on Monitoring Species Report of PT Surya Sawit Sejati in 2022, the results of the identification of flora and fauna including the RTE species, using the latest protection regulations, namely Permen LHK Number 106 of 2018 which are within the	Yes

Page 119 of 136



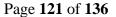
	 Flora: Consist of 401 types, for example are Rotan (Calamus sp.), Laban (Vitex pubescens), Besahang (Magnolia borneensis), Gaharu (Aquilaria malaccensis Lamk.), and Nyatoh (Payena leeril) Fauna: Consist of 28 amphibi, 41 snakes, 9 turtle, 10 lizard, 23 small mammals, 34 big mammals, 15 bats, 124 pisces, dan 213 aves (with 43 are protected). Based on the results of the evaluation conducted, it is known that the implementation of HCV area management is going quite well. The follow-up of the evaluation results is used as input for the management and monitoring of HCV areas in the next period. The results of interviews with the company's PIC, the results of the evaluation carried out will be used as input for the implementation of monitoring for HCV and RTE species for the next period. 	
7.12.8 (C)	The unit of certification conducts land clearing without prior HCV assessment. However, it has been preceded by an AMDAL study in 2007. From the document review of the area statement analysis, it shows that the company carried out the planting in 2004- 2009 and the HCV study in 2014. In this regard, the company has a LUCA obligation. The LUC Analysis study was conducted by Rodziah binti Hashim on May 9, 2014. The study area is 18,743.74 for 4 estates, while the scope of certification is only 6.717.62 ha. From the results of	NA
	the study, it was found that raw liability covering an area of 10,699.5 ha, and final conservation liability 2,508.76 ha, the document has been verified by Dr. Ismail Parlan with pass status. The analytical method for LUCA is image analysis and AMDAL conducted by Green Harvest Environmental Sdn Bhd (Kumai Estate, Lada Estate and Runtu Estate). There is no new planting after 15 November 2018, the first planting is conducted in 2004 – 2009 last planting is conducted in 2009.	



Audit ID: AUD ASA11/2024

5.0 Details of Nonconformities and Area of Concern identified during this assessment

5.1 Major Nonconformities:	Major Nonconformities: No Major NC was raised for this audit.				
5.2 Minor Nonconformities:	1 Minor NC wa	s raised for thi	s audit		
Non-Conformity Report					F05 Rev No.0
Report No.: RSPOPC/PTSSS/	/AA5-MIN-01		Date: 29 th August 2024		
Company Name: PT Surya Sawit Se	ejati-Lada POM		Site / Uni	t : Lada & Runtu Estate	
Audit Type: MA ASA1 ASA2	ASA3 A	ASA4			
Grade: Major		Minor 🖂		OFI	
Normative Reference and Requ A mechanism to check consistent in		_	in place.		
Description of non–conformity The unit of certification was not able to demonstrate that its procedures related to Internal and External Grievance (No. SOP-HRD-07-R00) and Stakeholder Communications (No. SSS-01-HMS-15) are consistently implemented					
Objective Evidence Observed b	y GGC:				
Runtu Estate: A creche worker had verbally informed the mandore in charge approximately one month ago that the creche ceiling had sprung a leak. During audit interview, the mandore confirmed receipt of the complaint. However, as of the date of this audit, the mandore has yet to record this grievance in the Grievance Book.					
Lada estate: Village heads of Desa Sumber Agung, Desa Sg Melawen, Desa Sg Rangit Jaya, Lada Mandala Jaya, and school headmaster of SD 2 Lada Mandala Jaya: Under paragraph 2.0 of the Stakeholders Communication Communication Procedure, all issues will be discussed with the stakeholders in a consultative manner. This however has not been done effectively, as the abovenamed stakeholders are not aware and do not understand the available grievance procedure, and how to carry out discussions in a consultative manner.					
Deadline for Implementation/Completion: Next surveillance Audit					
Lead Auditor Name: Dewi Akbari		Auditee Na	me: Lee Ki	an Wei	





F28-Report-RSPOPC-Rev09 Client Code: AA5 Report Number: GGC-AA5-ASA11/RSPOPC-V01-2024

P	mb.		Maria		
Signatu	ure:		Signature:		
Root o	cause of non-conformity:				
1.	No detailed record on the proposed a by the respective Business Unit.	ections an	d actions taken for various	request or grievance received	
2.	Lack of communication (refresh train and communities.	ning) for t	the respective Heads of De	epartment to brief the workers	
Action	taken to resolve the non-conforr	mities:			
4.	4. A revised template (Stakeholders logbook) to be included where the complainant will be kept informed on the status of request/grievance.				
5.	A memorandum has been sent to all the grievance redressal procedure.	Heads of	f Departments on 28 Augu	st 2024 to conduct briefing on	
6.	 A briefing will be conducted for all staff and workers on the person in-charge of recording the request/grievance. Similar briefing will be conducted for all external stakeholders including the loca communities during the stakeholders meeting. 				
Prevei	Preventive action taken:				
1.	 Monitoring of the records for request/grievance must be conducted by the Heads of Department on a monthly basis. 				
2.	The records on request/grievance will be verified during the routine internal audits to ensure all request/grievance(s) are addressed effectively and timely in accordance with the relevant procedure.				
Review of action taken:					
The action plan accepted. The effectiveness of the action taken will be further verified during next Annual Surveillance Audit.					
	Status→		⊠ Open	Closed	
	Signature→			1	



Final Close Date→

5.3 Opportunity for Improvement

a. Women's Rights

OFI			
OFI Report No. → RSPOPC/PTSSS/AA5-OFI-1	Date: 29 August 2024		
Company Name → PT Surya Sawit Sejati – Lada POM S	Site /Unit: Estate & POM		
Audit Type: MA ASA1 ASA2 ASA3 ASA4			
Normative Reference and Requirement:			
3.6.1 (C) All operations are risk assessed to identify H&S issues/activities risks at H&S issues. Mitigation plans and procedures are documented and implemented.	•		
Description of opportunity for improvement:			
The Company has the opportunity to finalize the risk identification in the HIRARC- or additions to existing operations at the estate and mill.	-document of any changes		
Objective Evidence Observed by GGC:			
The Company already has a HIRARC-document that identifies all activities at the Estate and Mill, however there are still activities that have not been included in the document, such as (but not limited to) a Harvesting under power lines			

OFI			
OFI Report No. → RSPOPC/PTSSS/AA5-OFI-2	Date: 29 August 2024		
Company Name → PT Surya Sawit Sejati – Lada POM	Site /Unit: Estate & POM		
Audit Type: MA 🗌 ASA1 🔀 ASA2 🔲 ASA3 🗌 ASA4 🔲			
Normative Reference and Requirement:			
6.1.5 (C) A gender committee is in place specifically to raise awareness, ide concern, as well as opportunities and improvements for women	entify and address issues of		
Description of opportunity for improvement:			
The certification unit has the opportunity to provide employees who have been selected as genc committee administrators/members with training on, among others:			

Page 123 of 136



- b. Counseling for women involved in violence cases
- c. Handling related issues (such as sexual harassment and fulfillment of reproductive rights).

Objective Evidence Observed by GGC:

Based on interviews with gender committee officer and members, the understanding of the duties and responsibilities of gender committee members is still inadequate.

	OFI	
OFI Report No.	→ RSPOPC/PTSSS/AA5-OFI-3	Date: 29 August 2024
Company Name	→ PT Surya Sawit Sejati – Lada POM	Site /Unit : Estate & POM
Audit Type: MA	ASA1 🖂 ASA2 🗌 ASA3 🗌 ASA4 🔲	
Normative Refer	ence and Requirement:	
6.1.6 (C) There is	evidence of equal pay for the same work scope.	
Description of op	pportunity for improvement:	
	the opportunity to avoid industrial relations dispuers who cannot follow the piece-rate system or reing.	.

Objective Evidence Observed by GGC:

After conducting interviews with the industrial relations staff of the Manpower Department of Kotawaringin Barat Regency, it has become evident that there have been ongoing disputes between the harvesters and the company for two consecutive years regarding wages under the piece-rate system. Furthermore, discussions with representatives of the Union have uncovered that certain harvesters were unable to meet the government's minimum wage standards due to their challenges in adhering to the piece-rate system.



5.4 Non-conformity Raised from the Previous Year, if applicable

This section gives an over view of new or revised non-conformities raised during this audit and of action taken to close out non-conformities raised during the previous audits, if applicable.

If a minor-non-conformity raised at the last audit, is not closed out, then this will be raised to Major status and the company given 90 days to close this out. In this case, upgraded NC will appear in section 5.1 above.

5.4.1 Major Nonconformities:	No previous NC raised.
5.4.2 Minor Nonconformities:	No previous NC raised.

5.5 N	oteworthy positive Components	
1.	PT Surya Sawit Sejati as overall is the main contribution industry in District, sub district specifically for village to improved surrounding communities economic and livelihood.	and
2.	The management is highly committed to comply with the RSPO system.	
3.	Well BMP's implementation in plantation's management system.	
4	Has received Proper Blue for the period 2022 – 2023.	
5	Use of Renewable Energy (Biogas Plant).	

6.0 Summary of GHG Emissions

Important Note:

All audit beginning 1st January 2020 must use PalmGHG Version 4 to show compliance to Criteria 7.10.1 of RSPO P&C 2018. The desktop application is now ready for use at

https://www.rspo.org/certification/palmghg/palm-ghg-calculator

All information and data below can be retrieved from the summary report generated through PalmGHG Calculator.

Summary of Net GHG Emissions

Emissions per Product	tCO2e/tProduct		
СРО	0.30		
PK	0.30		

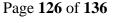
Production	t/yr
FFB processed	266,439
CPO Produced	58,646
PK Produced	12,817

Extraction	%		
OER	22.01		
KER	4.81		

Land use	На
OP planted area	8,459.82
OP planted on peat	260.60
Conservation	
(forested)	414.00
Conservation (non	
forested)	540.62
Total	8276.59

Summary of Field Emissions and Sinks

	Own Crop		Group		3rd Party		Total
	tCO2e	tCO2e /tFFB	tCO2e	tCO2e /tFFB	tCO2e	tCO2e /tFFB	
Emissions							
Land Conversion	86229.68	9.87	0.00	0.00	0.00	0.00	86229.68
*CO2 Emissions from Fertiliser	11184.81	1.28	0.00	0.00	0.00	0.00	11184.81





**N2O Emissions from Peat	2100.50	0.24	0.00	0.00	0.00	0.00	2100.50
Fuel Consumption	2853.54	0.33	0.00	0.00	0.00	0.00	2853.54
Peat Oxidation	15320.76	1.75	0.00	0.00	0.00	0.00	15320.76
Sinks							
Crop Sequestration	-81824.59	-9.36	0.00	0.00	0.00	0.00	-81824.59
Conservation Sequestration	-72452.17	-8.29	0.00	0.00	0.00	0.00	-72452.17
Total	-26276.07	-3.01	0.00	0.00	42508.00	0.00	16231.93

Summary of Mill Emissions and Credits

	tCO2e	tCo2e/tFFB
Emissions		
POME	6661.81	0.03
Fuel Consumption	624.77	0.00
Grid Electricity Utilisation	0.00	0.00
Credits		
Export of Grid Electricity	-	-
Sales of PKS	-1760.00	-0.01
Sales of EFB	-	-
Total	5526.58	0.02

Palm Oil Mill Effluent (POME) Treatment

Divert to compost	-
Divert to anaerobic	100 %
digestion	100 %

POME Diverted to Anaerobic Digestion

Divert to anaerobic pond	100 %
Divert to methane capture	_
(flaring)	
Divert to methane capture	
(electricity generation)	-

Page 127 of 136



7.0 Acknowledgement

7.1 Date of Surveillance Assessment Visit

The next annual surveillance assessment visit will be scheduled 9-12 months of the RSPO Certificate being issued.

7.2 Confidentiality

GGC auditors will not discuss or reveal any of the confidential information seen during the audit to any third party. Any public summary of the audit report will be acknowledged by the client prior to publication.

7.3 Signing of Report

Signed for on behalf of

PT Surya Sawit Sejati

Name: Lee Kian Wei

Role : Manager, Sustainability, United

Plantations Berhad Date : 24/09/2024 Signed for on behalf of

Global Gateway Certifications Sdn. Bhd

Name : Dewi Akbari Role : GGC Lead Auditor

Date : 24/09/2024

7.4 Signing by the Certifier

I the undersigned, being the Certifier, confirm that the information and conclusions included in this report have been prepared in good faith and that the certification decision has been based upon this information.

Acknowled	lged by:	Trump.
Name:	Muhd Jamalul Arif bin Hamid	
Position:	Certifier	,
Date:	27/09/2024	Signature



Annex 1 – Audit Agenda

	AGENDA					
Date	Location	Subjects	Lead Auditor	Auditor		
		Travelling day				
26 th August 2024 (Monday)		Fligt to Jakarta — Pangkalan Bun Batik Air — ID-6202 (06.00 —7.15)	DA	BG DH RY		
	2. Dinas Perkeb 3. Dinas Lingku 4.Badan Pertan Stakeholder Co 1. Head Village 2. Labour Unior 3 Gender Com 4.NGO (BG) 5.Tokoh Masya	ya Kerja Kabupaten (BG + RY) bunan Kabupaten (DH) ngan Hidup Kabupaten (DA) ahan Nasional Kabupaten (DA) nsultation: (RY) n (BG) mittee (BG) rakat (RY) /omen Representative (DH) A)				
	Lada POM	 11.00 – 11.30: Opening meeting Introduction by team leader Explanation & confirmation on ground planning arrangements 	DA	BG DH RY		
		 14.00 – 16.30: Document review and Site verification in POM Supplier of FFB & Sub-contractor (C2.2) FFB from legal sources (C2.3) Law & regulation and boundary pillar (C2.1) SC for POM (C3.8) Management/Business Plan (include replanting plan) and management review (C3.1) Continual Improvement Plan (CIP) & matrix template (C3.2) Water (C7.8) Fosil fuel & renewable energy (C7.9) 	DA			

Page 129 of 136



1	i		ı	1
		GHG (C7.10)HCV/HCS and/or HCS, LUCA, RaCP (if any) (C7.12)		
		 SOPs and/or Wis (C3.3) EIA (3.4) OSH (C3.6 & C6.7) IPM (C7.1) Pesticides (C7.2) Waste (C7.3) Soil fertility (C7.4) Minimise & control erosion (C7.5) Soil surveys & topographic (C7.6) Peatlands (C7.7) Fire (C7.11) 		DH
		 SIA (3.4) SDM (C3.5) Traning (C3.7) Discrimination (C6.1) Wages (C6.2) Labor Union (C6.3) No Child Worker (C6.4) Harassement or abuse & reproductive right (C6.5) Forced or trafficked labor (C6.6) 		BG
		 Transparancy & ethical code (C1.1 & C1.2) Supplier of FFB & Sub-contractor (C2.2) Human Right (C4.1) Complaint & Grievance (C4.2) Sustainability development on local level (C4.3) FPIC (C4.4) No NPP not FPIC (C4.5) Land Compensation (C4.6& C4.7) Legal land & land conflict (C4.8) SH Support (C5.1 & C5.2) 16.30 – 17.00 : Daily recap 		RY
		10.30 – 17.00 : Daily Tecap		
27 th August 2024 (Tuesday)	Lada Estate	 O8.00 – 16.30 : Document review for estate Supplier of FFB & Sub-contractor (C2.2) FFB from legal sources (C2.3) Law & regulation and boundary pillar (C2.1) SC for POM (C3.8) Management/Business Plan (include replanting plan) and management review (C3.1) Continual Improvement Plan (CIP) & matrix template (C3.2) Water (C7.8) 	DA	

Page 130 of 136



Fosil fuel & renewable e	energy (C7.9)
• GHG (C7.10)	HOAD OF CO.
HCV/HCS and/or HCS, L (C7.12)	LUCA, RACP (If any)
(07.12)	
SOPs and/or Wis (C3.3)	DH
• EIA (3.4)	
• OSH (C3.6 & C6.7)	
• IPM (C7.1)	
Pesticides (C7.2)Waste (C7.3)	
• Soil fertility (C7.4)	
Minimise & control erosic	on (C7.5)
Soil surveys & topograph	ic (C7.6)
• Peatlands (C7.7)	
• Fire (C7.11)	
• SIA (3.4)	BG
• SDM (C3.5)	
Traning (C3.7)	
• Discrimination (C6.1)	
Wages (C6.2)Labor Union (C6.3)	
No Child Worker (C6.4)	
	reproductive right (C6.5)
Forced or trafficked labor	r (C6.6)
Transparancy & ethical	code (C1 1 & C1 2)
Supplier of FFB & Sub-co	
Human Right (C4.1)	,
Complaint & Grievance	
Sustainability developme FDIC (C4.4)	ent on local level (C4.3)
 FPIC (C4.4) No NPP not FPIC (C4.5) 	
• Land Compensation (C4	
Legal land & land conflic	ct (C4.8)
SH Support (C5.1 & C5.)	2)
09.00 – 16.30 : Site verificat	tion & interview in
estate & stakeholder loc	
company areas	
Best practice : Manuring, Sp.	oraying, Harvesting,
Transportation, IPM	acusa/stara (include of
Waste management : warel LB3), workshop, land applica	
Legal compliance/boundary,	
Workers, management, OSH	
committe, labor union and/o	
aumalian auch contractor 0 at	akeholders interview



		 Worker's facilities (toilet, housing, pay, clinic, education, etc) etc 16.30 – 17.00 : Daily recap 		
28 th August 2024 (Wednesday)	Runtu Estate	 08.00 – 16.30 : Document review for estate Supplier of FFB & Sub-contractor (C2.2) FFB from legal sources (C2.3) Law & regulation and boundary pillar (C2.1) SC for POM (C3.8) Management/Business Plan (include replanting plan) and management review (C3.1) Continual Improvement Plan (CIP) & matrix template (C3.2) Water (C7.8) Fosil fuel & renewable energy (C7.9) GHG (C7.10) HCV/HCS and/or HCS, LUCA, RaCP (if any) (C7.12) 	DA	
		 SOPs and/or Wis (C3.3) EIA (3.4) OSH (C3.6 & C6.7) IPM (C7.1) Pesticides (C7.2) Waste (C7.3) Soil fertility (C7.4) Minimise & control erosion (C7.5) Soil surveys & topographic (C7.6) Peatlands (C7.7) Fire (C7.11) 		DH
		 SIA (3.4) SDM (C3.5) Traning (C3.7) Discrimination (C6.1) Wages (C6.2) Labor Union (C6.3) No Child Worker (C6.4) Harassement or abuse & reproductive right (C6.5) Forced or trafficked labor (C6.6) 		BG
		 Transparancy & ethical code (C1.1 & C1.2) Supplier of FFB & Sub-contractor (C2.2) Human Right (C4.1) Complaint & Grievance (C4.2) Sustainability development on local level (C4.3) FPIC (C4.4) 		RY

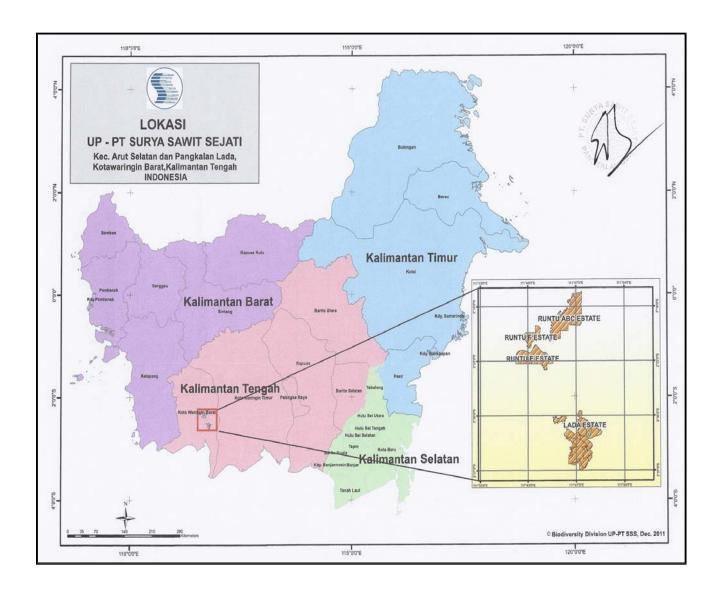
Page 132 of 136



	 No NPP not FPIC (C4.5) Land Compensation (C4.6& C4.7) Legal land & land conflict (C4.8) SH Support (C5.1 & C5.2) 109.00 – 16.30: Site verification & interview in estate & stakeholder locations surrounding company areas Best practice: Manuring, Spraying, Harvesting, Transportation, IPM Waste management: warehouse/store (include of LB3), workshop, land application (if any) Legal compliance/boundary, HCV, river & OSH issues Workers, management, OSH committee, gender committe, labor union and/or LKS bipartite, FFB supplier, sub-contractor & stakeholders interview Worker's facilities (toilet, housing, pay, clinic, education, etc) etc 16.30 – 17.00: Daily recap 		
29 th August 2024 (Thursday)	 08.00 – 09.00: Preparation for closing meeting Auditor's discussion & finalization Additional field visits and meetings with managers as necessary. 	DA	DH BG RY
	 10.00: Closing meeting Presentation of findings by the audit team NC closure dateline (if any) Questions and answers Final summary by team leader Ending Assessment 		
	Travelling back to Jakarta Batik Air - ID-6205 (15.55 – 17.10) Stay over night at Amaris Hotel Bandara (DA)	DA, DH,	BG, RY
30 August 2024	Traveling Jakarta to Pekanbaru Pelita Air – IP-322 (11.50 – 13.40)	D	A

Annex 2 - Maps

Figure 1: Location Map of PT Surya Sawit Sejati



Page 134 of 136



PT SWITE AUXIONAL SARAM

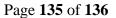
CHARLES TO SARAM SARAM

PT SWITE AUXIONAL SARAM

CHARLES TO SARAM SARAM

CHAR

Figure 2: Operational Map of PT Surya Sawit Sejati $_$ Runtu Estate





Service Manage States (Annual Control Services)

Service Manage States (Annual Control

Figure 3: Operational Map of PT Surya Sawit Sejai $_$ Lada Estate

