

**Roundtable on Sustainable Palm Oil Certification
R S P O**

[] Stage-1 [] Stage-2 [✓] Surveillance [] Re-Certification

Name of Management Organisation : Bumi Palma Mill – PT Bumipalma Lestari Persada, subsidiary of Golden Agri Resources Ltd
 Plantation Name : PT Bumipalma Lestari Persada – Bumi Palma Mill, Bumi Palma Estate, Bumi Sentosa Estate and Bumi Lestari Estate.
 Location : Village of Bagan Jaya, Sub District of Tempuling, District of Indragiri Hilir, Province of Riau, Indonesia
 Certificate Code : MUTU-RSPO/034
 Date of Certificate Issue : 25 March 2014 Date of License Issue : 25 March 2018
 Date of Certificate Expiry : 24 March 2019 Date of License Expiry : 24 March 2019

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-4	19 to 23 February 2018	Moh. Amarullah (LA), Rizliani Aprianita Hsb, Moh Arif Yusni, Yohanes Hardian, Steve Mualim	Ardiansyah	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-4	20 March 2018

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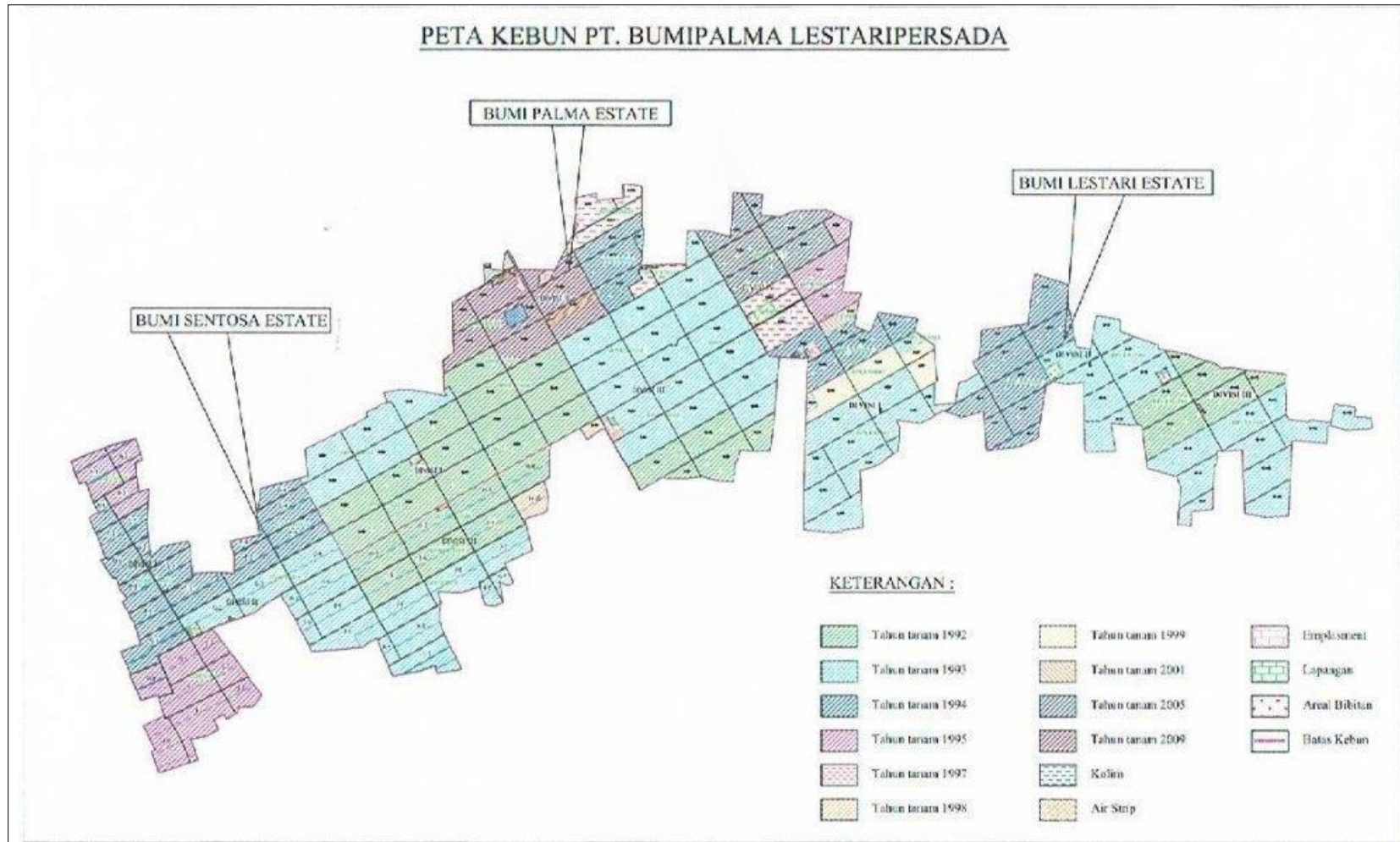
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Figure 2. Operational Map of PT Bumipalma Lestari Persada



Abbreviations Used

AMDAL	: Analisis Mengenai Dampak Lingkungan (Social and Environmental Impact Assessment)
ASA	: Annual Surveillance Assessment
BKSDA	: Balai Konservasi Sumber Daya Alam (Conservation and Natural Resources Board)
BPJS	: Badan Penyelenggara Jaminan Sosial (Social Assurance of Labor)
BPLE	: Bumi Lestari Estate
BPLP	: Bumipalma Lestari Persada
BPME	: Bumi Palma Estate
BSNE	: Bumi Sentosa Estate
BOD	: Biological Oxygen Demand
CH	: Certificate Holder
CPO	: Crude Palm Oil
CSR	: Corporate Social Responsibility
DPC	: Dewan Pimpinan Cabang or (Branch Leader Council)
FFB	: Fresh Fruit Bunch
FPIC	: Free Prior Informed and Consent
GAR	: Golden Agri Resources
GHG	: Green House Gasses
HCV	: High Conservation Value
HRD	: Human Resource Division
IPM	: Integrated Pest Management
ISCC	: International Sustainability & Carbon Certification
ISPO	: Indonesian Sustainable Palm Oil
KER	: Kernel Extraction Rate
MCAR	: Management Committee Agronomy and Research
MCMD	: Management committee for Mill development
MSDS	: Material Safety Data Sheets
NGO	: Non Government Organization
OER	: Oil Extraction Rate
OHS	: Occupational Health and Safety
OHSMS	: Occupational Health and Safety Management System
OIA	: Operational Internal Audit
P2K3	: Panitia Pelaksana Kesehatan dan Keselamatan Kerja (OHS Guiding Committee)
PIC	: Person In Charge
PK	: Palm Kernel
PMNP	: Plantation Monitoring and Planning
PPE	: Personal protective equipment
PUK	: Pelaksana Unit Kerja or (Unit Work Officer)
RAT	: Rapat Anggota Tahunan or (Annual Members Meeting)
RKL/RPL	: Rencana Pengelolaan / Pemantauan Lingkungan (Environment Management and Monitoring Plan)
RSPO	: Roundtable Sustainable Palm Oil
SCCS	: Supply Chain Certification Standard
SEL	: Studi Evaluasi Lingkungan (Environment Evaluation Study)
SIA	: Social Impact Assessment
SMARTRI	: SMART Research Institute
SOP	: Standart Operating System
SP	: Serikat Pekerja or (Worker/Labor Union)
SPO	: Sustainable Palm Oil
WTP	: Water Treatment Plant
WWTP	: Waste Water Treatment Plant

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1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016) • RSPO Supply Chain Certification Standard For organization seeking or holding certification, Adopted by the RSPO Board of Governors on 21 November 2014 (Revised on 14 June 2017) 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	Bumi Palma Mill – PT Bumipalma Lestari Persada, subsidiary of Golden Agri Resources Ltd	
1.2.2	Contact person	Ismu Zulfikar	
1.2.3	Organisation address and site address	RSPO registered company: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535 Liaison Office: Sinar Mas Land Plaza, Tower II, 30th Floor Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia	
1.2.4	Telephone	(+62-21) 318 1388	
1.2.5	Fax	(+62-21) 318 1389	
1.2.6	E-mail	ismu-zulfikar@smart-tbk.com	
1.2.7	Web page address	www.smart-tbk.com	
1.2.8	Management Representative who completed the application for certification	Ismu Zulfikar (Head of Environmental Department)	
1.2.9	Registered as RSPO member	1- 0056 – 08 – 000 – 00; 17 June 2008	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Bumi Palma Mill, Bumi Palma Estate, Bumi Sentosa Estate and Bumi Lestari Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Bumi Palma Mill	Village of Bagan Jaya, Sub District of Tempuling, District of Indragiri Hilir, Province of Riau, Indonesia.	S 0°35' 53.26" E 102° 59' 00.95"

1.4.2	Location of Certification Scope of Supply Base				
	Name of Supply Base	Location	Coordinate		
			Latitude	Longitude	
	Bumi Palma Estate	Village of Bagan Jaya, Sub District of Tempuling, District of Indragiri Hilir, Province of Riau, Indonesia.	S 0°36' 14"	E 102° 59' 19"	
	Bumi Lestari Estate	Village of Pebenaan, Sub District of Kritang, District of Indragiri Hilir, Province of Riau, Indonesia.	S 0°35' 59"	E 103° 01' 35"	
	Bumi Sentosa Estate	Village of Suhada, Sub District of Kritang, District of Indragiri Hilir, Province of Riau, Indonesia.	S 0°39' 11"	E 102° 55' 54"	
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State		6,690.00	Ha	
	• Community	-		Ha	
1.5.2	Area Statement				
	• Total area		6,690.00	Ha	
	• Mature area		3,723.47	Ha	
	• Immature area		2,359.08	Ha	
	• Mill and Emplishment		45.90	Ha	
	• Road		260.35	Ha	
	• Canal		272.20	Ha	
	• Air Strip		5.41	Ha	
	• Dock		0.08	Ha	
	• <i>Parit Mati</i>		0.23	Ha	
	• Occupation		23.28	Ha	
	<i>Source: Basic Info PT BPLP Tahun 2018</i>				
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (Ha)			
		Bumi Palma Estate	Bumi Lestari Estate	Bumi Sentosa Estate	Total
	Mature Area				
	2005	223.29	-	-	223.29
	2009	248.00	-	-	248.00
	2011	221.55	317.82	-	539.37
	2012	573.81	239.21	-	813.02
	2013	266.15	212.75	-	478.90
	2014	343.09	284.61	-	627.70
	2015	239.37	350.02	203.80	793.19

Immature Area							
	2016		337.56		244.57	-	582.13
	2017		276.77		-	1,500.18	1,776.95
	TOTAL		2,729.59		1,648.98	1,703.98	6,082.55
1.6.2	New Planting area after January 2010			- Ha			
1.6.3	Planting Cycle			2 nd Cycle			
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
Out put (tonnes)				Extraction (%)	Out put (tonnes)	Extraction (%)	
	Bumipalma	30	134,378.02	28,511.67	21.22	7,167.67	5.33
	<i>*Production data source from February 2017- January 2018</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
FFB (tonnes/year)						%	
	Bumi Palma	2,994.14	2,729.59	47,208.48	22.32	47,208.48	100
	Bumi Lestari	1,826.38	1,648.98	22,515.59	16.03	22,515.59	100
	Bumi Sentosa	1,869.48	1,703.98	6,918.05	4.06	6,918.05	100
	TOTAL	6,690.00	6,082.55	76,642.12	14.67	76,642.12	100
	<i>*Production data source from February 2017- January 2018</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)		
	PT Meganusa Intisawit – RSPO Certified	Associate growers	-	14,813.31	5,969.41		
	PT Kharisma Riau Sentosa Prima – Non Certified	Independent outgrower	-	-	8,812.06		
	PT Agro Tunggal Jaya Mandiri – Non Certified	Independent outgrower	-	-	42,954.43		
	TOTAL					57,735.90	
	<i>*Source Production Data on 12 months before assessment</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Previous Certificate Claim Mar 25 th 2017 to Mar 24 th 2018 (tonnes/year)		Actual certified product Mar 25 th 2017 to Feb 19 th 2018 (tonnes/year)	

	• FFB Production		82,426.00		74,575.14			
	• CPO Production		19,280.16		16,747.16			
	• Palm Kernel (PK) Production		5,507.09		4,840.55			
1.8.2	Product selling							
	Tonnage of selling product	Period of actual selling product Mar 25 th 2017 to Feb 19 th 2018						
	• CSPO sold as RSPO certified product				8,068.56			
	• CSPK sold as RSPO certified product				4,840.55			
	• CSPO sold under other scheme				5,543.64			
	• CSPK sold under other scheme				-			
	• CSPO sold as conventional				-			
	• CSPK sold as conventional				-			
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Bumi Palma	2,994.14	2,729.59	59,003	27.89			
	Bumi Lestari	1,826.38	1,648.98	34,411	24.50			
	Bumi Sentosa	1,869.48	1,703.98	1,859	9.12			
	TOTAL	6,690.00	6,082.55	95,273	20.50			
	<i>*Projected FFB production for 25 March 2018 to 24 March 2019</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Bumi Palma Mill	30	95,273	20,245	21.25	5,240	5.5	MB
	<i>*Projected CSPO and CSPK production for 25 March 2018 to 24 March 2019</i>							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			ISCC from GutCert				
	Others			ISPO from Mutuagung Lestari period 2014 – 2019 Gold Flag of OHS Management Sytem from Sucofindo				
1.10	Time Bound Plan							
	Time Bound Plan of Golden Agri Resources Ltd, updated 31 January 2016							
1.10	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time Bound Plan						
	Pangkalan Panji (PT Sawit Mas)	2013	Sawit Mas Estate	2013	South Sumatera	Certified		

Sejahteras)					
Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	South Sumatera	Certified
Muara Kandis Mill (PT Djuanda Sawit Lestari)	2013	Muara Tawas Estate	2013	South Sumatera	Certified
		Muara Kandis Estate	2013	South Sumatera	Certified
		Muara Kandis Estate (HGU on progress – 574.58 Ha)	2020	South Sumatera	-
		Smallholder (KKPA Pandawa)	2019	South Sumatera	-
		Smallholder (Pandawa Plasma)	2019	South Sumatera	-
Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Central Kalimantan	Certified
		Sungai Seruyan Estate	2013	Central Kalimantan	Certified
		Terawan Estate	2013	Central Kalimantan	Certified
		Tangar Estate	2013	Central Kalimantan	Certified
		Bukit Tiga Estate	2013	Central Kalimantan	Certified
Bukit Perak EMill (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung	Certified
		Bukit Permata Estate	2013	Bangka Belitung	Certified
Tanjung Kembiri Mill (PT Forestalestari Dwikarya)	2013	Tanjung Kembiri Estate	2013	Belitung	Certified
		Tanjung Rusa Estate	2013	Belitung	Certified
		Tanjung Rusa KKPA	2019	Belitung	-
Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung	Certified
		Smallholder (KKPA Gedung AJi Lama)	2014	Lampung	Certified
		Smallholder (KKPA Mesuji)	2014	Lampung	Certified
Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate	2014	Lampung	Certified
		Smallholder (KKPA Gedung AJi Baru)	2014	Lampung	Certified
Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2018	Cendrawasih Estate	2018	Papua	ST-1
		Nuri Estate	2018	Papua	ST-1
		Rajawali Estate	2018	Papua	ST-1
		Mambruk Estate (PT Sumber Indah Perkasa)	2018	Papua	ST-1
Pekawai Mill (PT Agrolestari Mandiri)	2018	Kayung Estate	2018	West Kalimantan	ST-1
		Pekawai Estate	2018	West Kalimantan	ST-1
		Sungai Kelik Estate	2018	West Kalimantan	ST-1
		Nanga Tayap Estate	2018	West Kalimantan	ST-1
		Smallholder (Kayung Plasma)	2019	West Kalimantan	ST-1
Kenanga Mill (PT Kencana Graha Permai)	2014	Kencana Estate	2015	West Kalimantan	Certified
		Cendana Estate	2015	West Kalimantan	Certified

		Kenanga Estate (PT Cahaya Nusa Gemilang)	2018	West Kalimantan	-
		Delima Estate (PT Kencana Graha Permai)	2018	West Kalimantan	-
		Gaharu Estate (PT Bangun Nusa Mandiri)	2019	West Kalimantan	-
		Smallholder (Gaharu Plasma)	2019	West Kalimantan	-
		Smallholder (Kencana Plasma)	2019	West Kalimantan	-
		Smallholder (Kenanga Plasma)	2019	West Kalimantan	-
Perdana Mill (PT Binasawit Abadi Pratama)	2020	Perdana Estate	2020	Central Kalimantan	ST-1
		Lenggana Estate	2020	Central Kalimantan	ST-1
		Semandau Estate	2020	Central Kalimantan	ST-1
		Muara Dua Estate	2020	Central Kalimantan	ST-1
Kuayan Mill (PT Agrokarya Prima Lestari)	2020	Mentaya Estate	2020	Central Kalimantan	ST-1
		Kuayan Estate	2020	Central Kalimantan	ST-1
		Bukit Santuhai Estate	2020	Central Kalimantan	ST-1
		Tajur Beras Estate	2020	Central Kalimantan	ST-1
		Seranau Estate	2020	Central Kalimantan	ST-1
		Sungai Sambon Estate	2020	Central Kalimantan	ST-1
		Smallholder (Sungai Sambon Plasma)	2020	Central Kalimantan	-
		Sapiri Estate (PT Buana Adhitama)	2020	Central Kalimantan	ST-1
		Bukit Dua Estate (PT Buana Adhitama)	2020	Central Kalimantan	
		Bukit Tunggal Estate (PT Buana Adhitama)	2020	Central Kalimantan	
Belian Mill (PT Paramitra Internusa Pratama)	2018	Belian Estate	2018	West Kalimantan	ST-1
		Tengkawang Estate	2018	West Kalimantan	ST-1
		Kenari Estate (PT Bangun Nusa Mandiri)	2019	West Kalimantan	ST-1
		Keranji Estate (PT Bangun Nusa Mandiri)	2019	West Kalimantan	ST-1
		Muara Tawang Estate (PT Kartika Prima Cipta)	2019	West Kalimantan	ST-1
		Kapuas Hulu Estate (PT Persada Graha Mandiri)	2018	West Kalimantan	ST-1
		Sungai Beran Estate (PT Persada Graha Mandiri)	2018	West Kalimantan	ST-1
		Smallholder (Belian KKPA)	2020	West Kalimantan	-
		Smallholder (Tengkawang KKPA)	2020	West Kalimantan	-

		Smallholder (Kenari Plasma)	2019	West Kalimantan	-
		Smallholders (Kapuas Hulu KKPA)	2020	West Kalimantan	-
		Kenanga Estate (PT Cahaya Nusa Gemilang)	2018	West Kalimantan	-
Sungai Kupang Mill (PT Sinar Kencana Inti Perkasa)	2016	Sungai Kupang Estate	2016	South Kalimantan	ST-2
		Sungai Kupang KKPA	2016	South Kalimantan	
		Senakin Estate	2019	South Kalimantan	-
Sungai Kikim Mill (PT Sawit Mas Sejahtera)	2019	Sungai Kikim Estate	2019	South Sumatera	-
		Sungai Pangi Estate	2019	South Sumatera	-
		Sungai Musi Estate	2019	South Sumatera	-
		Sungai Saling Estate	2019	South Sumatera	-
		Sungai Enim Estate (PT Bumi Sawit Permai)	2019	South Sumatera	-
		Sungai Lematang Estate (PT Bumi Sawit Permai)	2019	South Sumatera	-
Tangar Mill (PT Mitra Karya Agroindo)	2020	Sulin Estate	2020	Central Kalimantan	-
		Nahiyang Estate	2020	Central Kalimantan	-
		Katayang Estate	2020	Central Kalimantan	-
		Sungai Nusa Estate	2020	Central Kalimantan	-
		Kajui Estate (PT Agro Lestari Sentosa)	2020	Central Kalimantan	-
		Manuhing Estate (PT Agro Lestari Sentosa)	2020	Central Kalimantan	-
		Sungai Ayawan Estate (PT Aditunggal Mahajaya)	2020	Central Kalimantan	-
Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2019	Sungai Magalau Estate	2019	South Kalimantan	-
Jalemo Mill* PT Agro Lestari Sentosa	2020	Balasang Estate	2020	Central Kalimantan	-
		Jalemo Estate	2020	Central Kalimantan	-
Sako Mill* (PT Adi Tunggal Mahajaya)	2020	Sulin Plasma	2020	Central Kalimantan	-
		Sapiri Plasma	2020	Central Kalimantan	-
		Sako Plasma	2020	Central Kalimantan	-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	North Sumatera	Certified
		Penantian Estate	2011	North Sumatera	Certified
		Adipati Estate	2011	North Sumatera	Certified
		Kanopan Ulu Estate	2011	North Sumatera	Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	South Kalimantan	Certified
		Batu Mulia Estate	2012	South Kalimantan	Certified

		Sungai Panci Estate	2012	South Kalimantan	Certified
		Sungai Panci KKPA	2012	South Kalimantan	Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	South Kalimantan	Certified
		Kinta Pura Estate	2012	South Kalimantan	Certified
Langga Payung Mill (PT Tapian Nadenggan)	2012	Langga Payung Estate	2012	North Sumatera	Certified
		Paya Baung Estate	2012	North Sumatera	Certified
		Normark Estate	2012	North Sumatera	Certified
Hanau Mill (PT Tapian Nadenggan)	2012	Hanau Estate	2012	Central Kalimantan	Certified
		Tasik Mas Estate	2012	Central Kalimantan	Certified
		Tanjung Paring Estate	2012	Central Kalimantan	Certified
		Langadang Estate	2012	Central Kalimantan	Certified
		Medang Sari (PT Satya Kisma Usaha)	2018	Central Kalimantan	-
Semilar (PT Tapian Nadenggan)	2013	Semilar	2013	Central Kalimantan	Certified
		Sei Rindu	2013	Central Kalimantan	Certified
		Mandang	2013	Central Kalimantan	Certified
		Puri	2013	Central Kalimantan	Certified
Jak Luay Mill (PT Tapian Nadenggan)	2015	Pantun Mas Estate	2015	East Kalimantan	Certified
		Pantun Mas KKPA	2018	East Kalimantan	-
		Jak Luay Estate	2015	East Kalimantan	Certified
		Jak Luay KKPA	2018	East Kalimantan	-
		Long Buluh Estate	2015	East Kalimantan	Certified
		Bukit Subur Estate	2015	East Kalimantan	Certified
		Bukit Subur KKPA	2018	East Kalimantan	-
Leidong West Mill (PT MP Leidong West Indonesia)	2014	Leidong West Utara Estate	2014	Bangka Belitung	Certified
		Leidong West Selatan Estate	2014	Bangka Belitung	Certified
Muara Wahau Mill (PT Kresna Duta Agroindo)	2014	Muara Wahau Estate	2014	East Kalimantan	Certified
		Gunung Kombeng	2014	East Kalimantan	Certified
Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2019	Gunung Kombeng KKPA	2019	East Kalimantan	-
Rantau Panjang (PT Kresna Duta Agroindo)	2017	Rantau Panjang Estate	2017	East Kalimantan	-
		Rantau Panjang KKPA	2017	East Kalimantan	-
Jelatang Mill (PT Kresna Duta)	2014	Bangko Estate	2014	Jambi	Certified
		Tiga Serumpun KKPA	2019	Jambi	-

Agroindo)		Bukit Bungkul KKPA	2019	Jambi	-
		Kubang Ujo Plasma	2019	Jambi	-
		Pamenang Plasma	2019	Jambi	-
Pelakar Mill (PT Kresna Duta Agroindo)	2017	Pelakar Estate	2017	Jambi	ST-1
		Tiga Serumpun KKPA	2019	Jambi	-
		Batang Merangin Estate	2017	Jambi	ST-1
		Batang Tembesi Estate	2017	Jambi	ST-1
		Kubang Ujo Plasma	2019	Jambi	-
Langling Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi	Certified
		Bangko Plasma	2019	Jambi	-
		Bukit Bungkul KKPA	2019	Jambi	-
		Batang Gading Estate	2019	Jambi	-
		Batang Gading KKPA (PT Satya Kisma Usaha)	2019	Jambi	-
		Pamenang Plasma	2017	Jambi	-
Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi	Certified
		Sungai Bengkal KKPA	2015	Jambi	Certified
		Muara Kilis Estate	2015	Jambi	Certified
		Muara Kilis KKPA	2019	Jambi	-
Bukit Kapur Mill (PT SMART Tbk)	2020	Bukit Kapur Estate	2020	South Kalimantan	ST-1
		Sungai Cantung Estate	2020	South Kalimantan	ST-1
Samsam Mill (PT Ivomas Tunggal)	2009	Samsam Estate	2009	Siak-Riau	Certified
		Samsam Estate (HGU on progress – 29.09 Ha)	2020	Siak-Riau	-
		Kandista Estate	2009	Siak-Riau	Certified
		Kandista Estate (HGU on progress – 158.46 Ha)	2020	Siak-Riau	-
		Palapa Estate	2009	Siak-Riau	Certified
Libo Mill (PT Ivomas Tunggal)	2009	Libo Estate	2009	Siak-Riau	Certified
		Nenggala Estate	2009	Siak-Riau	Certified
		Nenggala Estate (HGU on progress 419.9 Ha)	2020	Siak-Riau	-
		Sei Rokan Estate	2009	Siak-Riau	Certified
		Sei Rokan Estate (HGU on progress – 102.7 Ha)	2020	Siak-Riau	-
Ujung Tanjung (PT Ivomas Tunggal)	2009	Ujung Tanjung Estate	2009	Siak-Riau	Certified
		Ujung Tanjung Estate (HGU on progress – 557.3 Ha)	2020	Siak-Riau	-
Naga Sakti Mill (PT Buana Wiralestari Mas)	2010	Naga Mas Estate	2010	Kampar-Riau	Certified

		Naga Mas Estate (HGU on process – 253.39 Ha)	2020	Kampar-Riau	-
		Naga Sakti Estate	2010	Kampar-Riau	Certified
		Naga Sakti Estate (HGU on process – 59.79 Ha)	2020	Kampar-Riau	-
		Rama Bakti Estate	2010	Kampar-Riau	Certified
Kijang Mill (PT Buana Wiralestari Mas)	2010	Kijang Mas Estate	2010	Kampar-Riau	Certified
		Kijang Mas Estate (HGU on process – 56.07 Ha)	2020	Kampar-Riau	-
		Kijang Kencana Plasma	2010	Kampar-Riau	Certified
Ramarama Mill (PT Ramajaya Pramukti)	2010	Ramarama Estate	2010	Kampar-Riau	Certified
		Ramarama Estate (HGU on process – 318.76 Ha)	2020	Kampar-Riau	-
		Amartajaya Plasma	2010	Kampar-Riau	Certified
Indra Sakti Mill (PT Meganusa Inti Sawit)	2011	Indra Lestari Estate	2011	Indragiri-Riau	Certified
		Indra Sakti Estate	2011	Indragiri-Riau	Certified
		Indragiri Plasma	2011	Indragiri-Riau	Certified
		Indrasakti Plasma	2011	Indragiri-Riau	Certified
Bumipalma Mill (PT Bumipalma Lestari Persada)	2012	Bumi Lestari Estate	2012	Indragiri-Riau	Certified
		Bumi Palma Estate	2012	Indragiri-Riau	Certified
		Bumi Sentosa Estate	2012	Indragiri-Riau	Certified
Sawita Mill (PT Sawitakarya Manunggal)	2018	Sawita Estate	2018	South Kalimantan	ST-1
		Pamukan Estate	2018	South Kalimantan	ST-1
		Sawita KKPA	2018	South Kalimantan	ST-1
*)under construction					
<p>There are revision of time bound plan, the justification from top management is:</p> <ol style="list-style-type: none"> 1. Pelakar Mill and Rantau Panjang Mill is still process on disclosure & liability by RSPO, while Bukit Kapur Mill doesn't have land use title (HGU), the HGU is still on process. 2. Several associate smallholders (plasma) which refuses to follow the RSPO certification, but the management unit is still communicating with the plasma for the implementation of RSPO certification. 3. Sawita Mill had conducted pre assessment RSPO on 2015 and Another entire Management Unit under PT Ivo Mas Tunggal has been RSPO certified. <p>There is revision of time bound plan on 1 October 2017 for HGU on process in PT Ivomas Tunggal (Samsam Estate 29.09 Ha, Kandista Estate 158.46 Ha, Nenggala Estate 419.9 Ha, Sei Rokan Estate 102.7 Ha, Ujung Tanjung Estate 557.3 Ha); PT Rama Jaya Pramukti (Ramarama Estate: 318.76 Ha); PT Buana Wira Lestari (Naga Sakti Estate 59.79 Ha; Naga Mas Estate 253.39 ha and Kijang Estate 56.07 ha). For this area is planned for audit on 2020 because waiting for HGU</p>					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	BPMM has received FFB from outgrowers, e.g. PT Agrotunggal Jayamandiri and PT Kharisma Riau Sentosa. The former company was FFB trader while the latter has a short term agreement towards FFB processing, with BPMM.				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-4	<p>Mohamad Amarullah (Lead Auditor witnessed). Indonesia Citizen. Master of Wood Science and Technology and Bachelor of Forestry, majoring in Forest Product Technology. Had experience as an Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. Had attended several trainings such as Lead Auditor of ISPO, RSPO, ISO 17021, ISO 17065, ISO 9001, ISO 18000, ISO 14001, HCV, etc. Had conducted several RSPO audit scheme as an Auditor since 2014 in legal, BMP, environment, conservation, safety and supply chain aspect. Fluent in Bahasa, Malay and English. At this audit he has verify legal aspect, SCCS, OSH and Time Bound Plan.</p> <p>Moh. Arif Yusni (LA witnesser). Indonesia citizen, Bachelor of Agriculture, majoring of Plant Pest and Diseases (Plant Protection). He has working experience for 2 (two) years since 2010 as Operational staff in a provate oil palm plantation company in Indonesia. Trainings attended namely: Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course. Now he worked at Professional Certification Body. He has been several times following audit related to sustainable palm oil certification system as an observer and auditor. Training attended: ISO 19011, ISO 9001; ISPO 14001, RSPO Lead Auditor, ISPO Lead Auditor, OHS Expert, OHS Auditor based on National Government No 50 year of 2012. Since 2012 has been following many audit as auditor for ISPO and RSPO Scheme for several aspect, such as Best Management Practices, Best Manufactures Practices, land Legality, Worker Welfare, OHS, Social, Environment, conservation, Integrated pest management, transparency, long term economic aspect and Supply chain for palm oil mill. At this audit activity he has roles as LA witnesser.</p> <p>Rizliani Aprianita Hasibuan (Auditor). Indonesia Citizen. Bachelor and Magister of Agribusiness. She had followed training such as lead Auditor ISO 9001;2008, ISO 14001;2004, ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering social aspect, health and safety aspect, worker welfare and waste management aspect. At this audit activity she has verify worker welfare and Social aspects.</p> <p>Yohanes Hardian (Auditor). Indonesia Citizen. Diploma of Forest Resource Conservation, specialist in environment and wildlife. Has Worked as Staff Rehabilitattion project at WWF Central Kalimantan region. Had attended training HCV, has been involved in several activity of HCV Identification of Oil Palm Plantation. Has worked as an environmental staff on Oil Palm Plantation. Has trained as ISPO auditors and have attended training Auditor ISO 9001 and ISO 19011, Legal documents in-house training with the ISPO commission. Training SIA bu Remakr Asia 2016, Training Lead Auditor RSPO by Proforest- Daemeter 2016. Experience audit RPO And ISPO Since 2014. At this audit activity he has verify Best Management Practices aspects.</p> <p>Steve Mualim (Auditor). Master in Environmental Science. Has worked as a freelancer in several consultants working in the field of Environmental Impact Assessment. The training that has been followed is ISPO Lead Auditor training, RSPO awareness, Ecological Risk Assessment, Asian Carbon Update and Network, and Climate Change Mitigation and Adaptation for Agricultural Productivity. At this audit activity he has verify environmental, GHG and conservation aspects.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-4	<p>Number of auditors : 4 auditor Number of days for ASA-4 at site: 5 days Number of working days for ASA-4 at site : 20 Working days</p>
2.2.2	Assessment Process
ASA-4	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT BPLP to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013, endorsed September 2016 and Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, Revised in June 14th 2017 (Module E for CPO Mill)</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or</p>

substances from required documents; (2) *interview*, aiming to obtain more detailed information and cross check the information; and (3) *field observation*, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results **ASA-4** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**RC**).
Improvement of findings from main assesment findings were observed by auditors at this **ASA-4** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **RC**.

The assessment program please find Appendix 2

2.2.3 Locations of Assessment

ASA-4

Bumi Palma Mill

- **Security Post.** Observations regarding the acceptance of FFB transporter from supplier, and interview with workers toards OHS and Labor
- **Loading Ram /grading.** Field observations related to the process of selecting FFB
- **Weighing station of the FFB.** Interviews with workers related to the process of weighing, wages, women's rights and workers' rights.
- **Process flow from station sterilizer, thresher, sludge tank, press, boiler, engine room.** Observations and interviews relating to safe work practices, PPE, workers' rights such as wages, overtime and other labor rights.
- **Hazardous waste storage.** Observation for toxic and hazardous waste management
- **Water treatment plant.** Observation for water usage monitoring
- **EFB furnace.** Observation for EFB waste management
- **Diesel fuel tank.** Observation for hazardous material management
- **Chemical storage.** Observation for hazardous material management
- **Waste water treatment plant.** Observation for waste water management

Bumi Lestari Estate

- **Spraying in Block H3.** Observation of spraying activities and interviews on health screening, employee understanding of spraying SOP, employment.
- **Subsident pole and Piezometer in Block H3.** Observation of subsidized benchmark conditions and staff interviews on monitoring techniques.
- **Harvesting in Block L9.** Observation of harvesting activities and interviews on health screening, employee understanding of harvesting SOP, employment.
- **Landfill block G5 div 1.** Observation for domestic waste management
- **Replanting block G5 div 1.** Observation for replanting management
- **Daycare.** Observation and interviews related to employee welfare facilities, wages, employment and domestic waste management.
- **Housing Complex.** Observation of the availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Fertilizer warehouse.** Observation and interviews related to hazardous management, waste management and implementation OHS.
- **Workshop.** Observation and interviews related to the competence of workers, implementation OHS (including medical check up), employment, waste management and complaint mechanism.
- **Chemical Warehouse.** Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS.
- **Rinse house for spray team.** Observation and interviews related to washing of working tools, PPE spray teams and used pesticide containers handling.
- **Divisi 1 Block H07** (planted in 2016). Observation **Poles No. BPLP 17** condition, located in adjacent with enclave and oil palm fields owned by community from Sungai Rukam Village.
- **Divisi 2 Block L06** (planted in 2014). Observation **Poles No. BPLP 60** condition, located in adjacent with local coconut fields owned by community from Sanglar Village.
- **Divisi 2 Block K08** (planted in 2012). Observation **Poles No. BPLP 25** condition, located in adjacent with oil palm fields owned by community from Pengalihan Village.

- **Divisi 1 Block G05.** Observation of landfill.
- **Divisi 1 Block L03** (planted in 2016). Observation **Poles No. BPLP 67** condition, located in adjacent with local coconut fields owned by community from Pebenaan Village.

Bumi Sentosa Estate

- **Nursery, Division 4.** Observation of nursery activities. Based on interviews, assistant and foreman seeds can explain the breeding procedures well. Seed selection is done regularly every 3 months by chopping and then discarded. Fertilization and maintenance are carried out routinely and are nominated by the nursery foreman.
- **Manual upkeep Block G01.** Observation and interviews with worker which also pesticide applicators on their understanding towards technical, OSH and manpower aspects.
- **Subsident pole and Piezometer in Block G01.** Observation of subsidized benchmark conditions and staff interviews on monitoring techniques.
- **Insert planting activities in Block H03.** Observation of insertion planting activities and interviews on employment.
- **Replanting block H8.** Observation for replanting management
- **Fertilizer warehouse.** Observation and interviews related to hazardous management, waste management and implementation OHS.
- **Warehouse complex (Agrochemical storage, Fuel and Lubricant Storage, Workshop).** Observation and interview on environmental aspect, OHS implementation and understanding of working procedure.
- **Scheduled Waste.** Observation on hazardous waste management.
- **Health Clinic.** Observation on first aid mechanism, medical waste management and work accident record monitoring.
- **Creche and Daycare.** Observation on facilities and interviewing related labour aspect and grievance mechanism to the person in charge.
- **Housing complex at Division 2.** Observation on workers facilities, domestic waste management, temporary storage near division office, water pump machine.
- **Emergency Response in Estate Unit.** Observation on emergency response facilities (fire extinguisher, water tank for fire fighting, etc.) and its mechanism.
- **Divisi 2 Block H10** (outside HGU area). Observation **Poles No. BPLP 82** condition as well as its management, located in adjacent with public cemetery and planted in 1998 (currently no/stop replanting).
- **Divisi 3 Block I08** (planted in 2017). Observation **Poles No. BPLP 83** condition, located in adjacent with local coconut fields owned by community from Pebenaan Village.
- **Divisi 2 Block J01** (planted in 2017). Observation **Poles No. BPLP 99** condition, located in adjacent with oil palm fields owned by community from Nusantara Jaya Village. This area were occupied by Abdul Samad and Wardi for about 1.67 ha.
- **Divisi 1 Block F02** (planted in 2015). Observation **Poles No. BPLP 120** condition, located in adjacent with oil palm fields owned by community from Karya Tani Village. This area were occupied by Timbul for about 9.34 ha.
- **Divisi 2 Block G03.** Observation of landfill.

Public consultation (19 February 2018)

- **Guesthouse of PT BPLP.** Interview with 9 persons as representative from 6 PT BPLP surrounding villages, about land rights, legal, land dispute, conflict resolution, information of transparency, social, conservation and environment aspects.
- Interview with Manpower agency and Environmental agency, Indragiri Hilir Regent

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-4	Consultation of stakeholders for PT BPLP held by: <ol style="list-style-type: none"> 1. Public announcement at web www.mutucertification.com on 7 February 2018. 2. Public consultation by interview with government agencies in Indragiri Hilir District (Environmental Agency and Manpower Agency) on 19 February 2018.

	<ol style="list-style-type: none"> 3. Public consultation by interview with locals of the nearby village (Suhada Village, Bagan Jaya Village, Sanglar Village and Pembenaan Villange) and local contractor on 19 February 2018 4. Consultation meeting and interview with Internal Stakeholder (labour union, worker cooperative and gender committee) on 31 January 2017 and gender committee on 19 February 2018 5. Consultation with NGO (Jikalahari and WWF) via email on 7 February 2018.
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (RC) will be determined one year after this ASA-4

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Bumi Palma Mill– PT BPLP operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were zero (0) Nonconformities were assigned against Major Compliance Indicator(s) zero (0) nonconformity(s) were assigned against Minor Compliance Indicators zero (0) and zero (0) nonconformance(s) against supply chain requirement for CPO mill Bumi Palma Mill– PT BPLP and two (2) opportunity(s) for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

MUTUAGUNG LESTARI found that Bumi Palma Mill – PT BPLP complied with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013, endorsed September 2016 And Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, revised in June 14th 2017 (Module E for CPO Mill).

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is Continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
<p>1.1.1 Until ASA-4, there is no changes related to stakeholder list. The company shown the list of stakeholders updated in 2018 consisting of government agencies, universities, surrounding villages, workers' organizations, public figures, and etc. The company has develop SOP Communication and Consultation No.SOP/SMART/UMUMSADV/004, Rev.0.0 and approved by the Head of Upstream. This procedures explained that the submitted suggestions will be presented by the Head Unit to the relevant departments if necessary at least 1 week after the letter was received. The response to incoming mail not later than three (3) weeks after the letter was received. The Personal in Charge of providing information is Social officer. Complementing satellite image information data related to fire monitoring (OFI)</p>		
<p>1.1.2 Company conduct Control and Document storage periods based on proceudres of Control and Document storage period No. SOP / SPO / SMART / LH-02, Dated July 1, 2010. Officer SPO is responsible for identifying and planning the necessary information and shall be communicated / response plan to stakeholders and the depositary; responses to incoming mail not later than three weeks after the letter was received; and response that have been considered and then delivered to stakeholders with a receipt. List of stakeholders that are owned by the company e.g: local government Indragiri Hilir Regency (Plantation Agency, Environmental Agency, Labor and Transmigration Agency, National Land Agency, Regional Revenue Office); Sub District Head of Enok, Village chief of Bagan Jaya, Village chief of Suhada, Village chief of Sanglar, Village chief of Bagan Jaya, Community Leaders and Workers Union. The company also shown communication logbook periods 2017-2018 which describes letter date, PIC, applicant name, the institution, the request, the necessary, the disposition, the decision maker and the letter status. Document review</p>		

shown that all of information request has been responded by company on time and interviews with related agency such as Environmental agency and manpower agency acquired information that compulsory report has been submitted for regular basis by company.

Status: OFI

1.2

Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

1.2.1

Company shown list of information for stakeholders listed on documents F/SMART/GENERAL/SADV/004/005. The information list includes the number of employees and a list of basic wages of employees, personnel tax, payment of local taxes/retribution, environmental documents, deed of establishment and its amendments, the data of area and production, and fertilizer application data, evidence of land tenure, High Conservation Value identification report, HCS report, SIA identification reports, CSR program reports, guiding committee of occupational health and safety report, and etc. The list is available at each unit and can be accessed by internal and external stakeholders. If stakeholders ask for documents apart from the list, it needs approval from top management.

Based on interview with related agency and document review shown, company has socialized information that publicly available to related stakeholders.

Status: Comply

1.3

Growers and millers commit to ethical conduct in all business operations and transactions.

1.3.1 Minor

The company has a code of conduct policy of commitment to ethical conduct in all business operation and transaction. The policy was approved on August, 01 2014 by regional Controller and has disseminated to all workers including contractor workers in Bahasa. For example, minutes of meeting socialization on June 28, 2017 attended by 44 participants and on March, 7 2017 attended by 14 contractor workers. According to interviews with workers during field for example harvesters, sprayer team, boiler operator, as well as on local contractor, they already know and understand the business ethics policy. The business policy is also on display at the estate and mill offices.

Status: Comply

PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

2.1

There is compliance with all applicable local, national and ratified international laws and regulations.

2.1.1; 2.1.2; 2.1.3

The CH has list of Indonesian laws/regulations, international laws or conventions which adopted as reference for oil palm plantation and processing process activities, and classified it based on several aspects. It was documented that totaling about 189 items of laws and/or regulations were related to land permit and legality aspect, manpower aspects, occupational health and safety (OHS) aspect, conservation aspect and environment aspect. There are additional regulations on 4 September 2017 as follows:

- Regulation of the Minister of Environment and Forestry no P15 / MENLHK / SETJEN / KUM.1 / 2/2017. About Water Measurement Procedures at Setting Point of Peat ecosystem.
- Regulation of the Minister of Environment and Forestry no P16 / MENLHK? SETJEN? KUM.1 / 2/2017 on Technical Guidelines for Recovery of Peat Ecosystem functions
- Decree of the Minister of Environment and Forestry no SK130 / MENLHK / SETJEN / PKL.0 / 2/2017 regarding the establishment of National Peat Ecosystem Function Map.

Employment :

The Company has applied wages and overtime in accordance with applicable labor regulations. The Company has applied the minimum wage in accordance with the Decree of the Governor of Riau no. 120/II/2017 concerning Minimum Wages of Palm Oil of Riau Province Year 2017 on January 21, 2017.

Legal Aspect

In term of legal and permit regulation pursuance, CH is able to shows several documents, such as Location Permit,

Plantation Business Permit (SPUP), and Land Tenure or Land Use Right (HGU). Furthermore, Based on information from estate management, surrounding local communities (Village of Bagan Jaya, Pengalihan, Lintas Utara, Suhada, Sungai Rukam, and Pebenaan) and Government Agencies of Indragiri Hilir Regency (Manpower and Environment Agency), as well as review on PT BPLP hectare statement it could be concluded that there is no expansion and new planting areas of PT BPLP

Procedure of laws/regulations pursuance of legal requirements was presented in document Form No. F/SMART/UMUM/SADV/002/002. The document has describes information of laws and regulations listed, identification of requirement, the last evaluation conducted at 4 september 2017, status of pursuance, person in charge (PIC) and target. Furthermore, mechanism of laws and regulations update and evaluation was presented in document procedure No. SOP/SMART/UMUM/SADV/I/002. Chapter II of procedure describes a flowchart of laws/regulations pursuance, starts from identification of relevant national and local laws and regulations, collection and update, arrangement, distribution to the respective parties/Departments, acceptance of documents, document management (storage), socialization, evaluation, implementation, fulfillment and continuous evaluation.

2.1.4

Update, evaluation and document compilation was under Sustainability Palm Oil Officer (SPO) in every estate and mill units. The CH has shows letter of assignment of SPO Officer from Regional Controller (RC) of Indragiri No. 145/RC-INDRAGIRI/SK/X/2015 dated October 12th 2015. The letter mentioned that staff with SPO PSM-5 position was appointed as person in charge for update and monitoring of laws and regulations implementation..All documents listed were available to be accessed by all management level through SPO Officer.

Status: Comply

2.2

The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.

2.2.1

Certificate Holder (CH) is able to shows document evidence towards land use right such as Location Permit through Governor of Riau Decree No. kpts.22/P.T-V/1990 dated May 2nd 1990; Plantation Business Permit (SPUP) through Letter of Department of Forestry and Plantation No. 758/Menhutbun-VIII/2000 dated June 29th 2000 for oil palm plantation activities which covers 6,690 ha with oil palm processing capacity 30 ton FFB/hours; and Land Tenure or Land Use Right (HGU) through Decree of Minister of Agraria and Chief of National Land Agency (BPN) No. 73/HGU/BPN/95 dated November 10th 1995, with Certificate HGU No. 1 dated April 20th 1996 for area covers 6,690 ha. The HGU was valid until December 31st 2030. Based on information from external stakeholder and review on PT Bumipalma Lestari Persada (PT BPLP) hectare statement 2018 it could be concluded that there is no expansion and new planting areas of PT BPLP. Currently PT BLPL has managed area totaling for about 6,729.21 ha, which consist of 6,690 ha under HGU and 39.21 ha HGU-on process. However, scope of certification has stick on HGU area (6,690 ha).

2.2.2

Procedure of legal boundary (BPN) poles monitoring and maintenance is presented in document No. SOP/SMART/CERS-EHSD/SADV/I/004 dated July 1st 2014. Procedure mentioned that maintenance was carried out by Foreman with supervision of Assistant. Estate management were able to shows location of BPN poles map as well as its coordinate points, which presented in document of Specific Situation Map No. 02/1995 PT BPLP dated March 30th 1995 with scale 1:25,000. BPN poles monitoring record period 2017 informed that from totaling 131 poles monitored it was identified 32 poles in Bumi Palma Estate (BPME), 55 poles in Bumi Lestari Estate (BPLE) and 44 poles in Bumi Sentosa Estate (BSNE) were in good condition and satisfactory maintained. Based on field observation to Poles No. BPLP 17 (BPME Divisi 1 Block H07), No. BPLP 60 (BPME Divisi 2 Block L06), No. BPLP BPME (Divisi 2 Block K08), BPLP 67 (BPME Divisi 1 Block L03), No. BPLP 82 (BSNE Divisi 2 Block H10), No. BPLP 83 (BSNE Divisi 3 Block I08), No. BPLP 99 (BSNE Divisi 2 Block J01) and No. BPLP 120 (BSNE Divisi 1 Block F02), it could be concluded that estate management has monitor their boundary legal poles, clearly demarcated and visibly maintained.

2.2.3

Estate management mentioned that land dispute and legal acquisition or compensation payment had conducted starting from 1991/1992 to the last which fully settled up in 2006. This statement is confirmed during public consultation with local

communities' representatives from Village of Bagan Jaya, Pengalihan, Lintas Utara, Suhada, Sungai Rukam, and Pebenaan, which mentioned as comply. All representative mentioned that land dispute arrangement solution has conducted through free, prior and informed consent (FPIC) process with stakeholders. Several evidence such as inventarisation of dispute areas, minutes meeting of affected parties, statement letter from occupant, land release letter, receipt of compensation payment were available. Furthermore, Environment Agency of Indragiri Hilir informed that there is no expansion and new planting areas of PT BPLP.

2.2.4; 2.2.5 and 2.2.6

Procedure of land dispute or conflict resolution is presented in document No. SOP/SMART/SENS-CSR/SADV/II/002 dated July 1st 2014. According to the previous assessment, it was reported that land dispute were settled up since 2006. However, it was reported by estate management that there were identified new disputes areas totaling for about 23.28 ha, which claimed by 8 persons from surrounding Villages. Map of dispute areas was available. To overcome this situation, estate management, occupant and stakeholder from village representative (Chief of Village and Elders) has agreed a resolution which mentioned that there will be no conflict between affected parties. All agreement were signed in January 2018 and this matters has goes smoothly without any conflicts. Hence it could be concluded that land conflict could be handled through a smooth and prior to kinship process which involving representative from respective Villages.

CH has policy to avoid escalation conflict which refers to Golden Agri Resources (GAR) as mother company of PT BPLP. The policy issued by Head of Upstream, Chief Executive Officer (CEO) of Downstream and Commercial, Executive Director, Chief of Financial Officer (CFO) and Managing Director of Sustainability and Strategic Stakeholder Engagement on September 8th 2015. The policy in point 2.1.2 mentioned that GAR has committed to actively promoting and supporting the responsible resolution of any conflicts involving GAR operation with legitimate concerned at the time underlaying events occurred. This will include working with relevant stakeholders to ensure that a balanced, accountable, mutually agreed and documented conflict resolution system is accessible to smallholders, indigenous peoples, rural communities and other affected parties based in order to deal with complaints, grievances and resolve conflicts to the mutual satisfaction of the parties based on respect for their legal and customary rights, including to lands and resources and their right to give or withhold their free, prior and informed consent to operation planned on their lands. The system will include the mapping of all conflicts in GAR's operations, the development of action plans to address identified conflicts, transparent monitoring and reporting, the option to local community and or customary groups for accessing independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers as well as the option of a third party mediator. Furthermore, GAR management has also categorically reject the use of violence in any dispute by any parties.

Status: Comply

2.3

Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.

2.3.1; 2.3.2; 2.3.3 and 2.3.4

Procedure of Free Prior Inform and Consent (FPIC) is presented in document No. SOP/SMART/SENS-CSR/SADV/II/003 dated July 1st 2014. The procedure mentioned that FPIC shall be implemented since the beginning of estate and mill development. Team of FPIC was established by the CEO.

Based on interview with representatives from Village of Bagan Jaya, Pengalihan, Lintas Utara, Suhada, Sungai Rukam and Pebenaan, as well as interview with BPN, Plantation Agency and Environment Agency of Indragiri Hilir, it was informed that there no presence of customary and indigenous people rights. Community composition were considered plural (consist of Malay Javanese, Minang, Batak, Bugis, Banjar, etc.). This fact has also mentioned in HCV assessment report which released in February 2013. Up to ASA-4, it was known that there is no extension of estate operational areas. Moreover, record of compensation payment of land dispute areas has explained in Criteria 2.2.

Status: Comply

PRINCIPLE #3 Commitment to long-term economic and financial viability

3.1

There is an implemented management plan that aims to achieve long term economic and financial viability.

3.1.1

Company has drafted estate and mill's 5 years work plan (2018 – 2022) which has been approved by top management. This work plan consists of: prediction over price trend, CPO and Palm Kernel; production cost; FFB, CPO and Palm Kernel's production; mill's extraction level; areal statement; and profit projection.

The Company annually conducts financial audits assisted by a public accountant. Based on the study documents, the company has demonstrated record audit results public accountant PT. Bumipalma Lestari persada conducted by public accounting firms Mirawati Sensi Idris (Registered Public Accountant AP.0155). In the 2016 audit report document (No. 07911017SA)) shows that the financial statements are fairly stated in all material things, the financial position and financial performance and the cash flows in accordance with financial accounting standards in Indonesia. As for the independent financial audit report in 2017 are not yet available because the audit has not been completed.

3.1.2

Based on interview with operational unit, replanting program currently in PT BPLP has been completed. Also based on the latest statement acreage report, the current oil palm planting year 1993 to 2001 has been completed replanting in 2017. For 2018 the company has an insert planting program on replanting area.

Status: Comply

PRINCIPLE #4 Use of appropriate best practices by growers and millers

4.1

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

Certificate holder has a Standard Operating Procedures (SOP) for palm oil plantation and mill, which consist of technical guideline document for palm oil plantation. This document drafted by team of MCAR (Management Committee Agronomy and Research) in 2012. The SOP documents among others about Planning of New Area Planting, Replanting Plans, Nurseries, Land Clearing, planting, replanting, Pest and Disease Control, Weed Control, Fertilization, Maintenance of Immature plant, Preparation Ahead of Harvest, Harvesting, Loading and Transportation of FFB and Measurement of Rainfall by Ombrometer. Based on the results of interviews with pesticide applicator and harvest workers at BPLE it is known that employees understand the working procedures well. Workers are able to explain the stages of work done

The Company also has a complete SOP associated with the processing of palm oil into CPO and PK in the palm oil mill contained in the SOP No. 04-09 / MCMD-SOP / 438 revisions number 4. SOP approved by Chairman MCMD and entered into force on 1 September 2010. The SOP includes standard operating procedures in POM include: FFB reception station, sterilization activities, slamming station (threshing), press station, clarification station (purification), clarification station; Oil recovery tank sub station, nut and kernel station, boiler and engine room, water treatment, final effluent, storage tank washing.

Based on the information can be concluded that the company has documented all kinds of operational procedures. Based on interviews with workers at the boiling station (sterilizer). Workers released the results of FFB boiled sent to the station thresher and this has been done in accordance with the applicable procedures.

4.1.2

Company has a procedure for monitoring mill and estate operation, whether it has been run based on the established target through internal audit every semester by Operational Internal Audit (OIA) unit. Personnel in charge in internal control have been trained and have competency on their expertise.

The internal audit operation has been conducted on 30nd August 2017 for the entire activity in PT BPLP. The audit presents data that in general the condition from previous report has been improved. However, there are still some weaknesses from human error that need to be improved. The audit findings are informative and in general have been discussed with unit management representative. In addition, the unit also presents detail of findings from internal audit in Bumi Lestari Estate, Bumi Sentosa Estate and Bumi Palma Mill. The audit findings has been response and explain from the management unit as part of its improvement efforts.

4.1.3

The management unit has documented the report and record its estate and mill's operation activity, such as recording supervisor daily activity and supervising the annual monitoring over internal activity of OIA. The improvement from the entire findings from internal audit is directly documented in a separate place. The document consists of management response and improvement suggestions, which can be taken by the management unit from internal audit team. Based on field visit in BPLE Block H03 and G01, its known that the management unit has implemented the harvesting activity, maintenance, holistic pest disease based on its applicable regulations.

4.1.4

Procedure of third party FFB source was presented in document of Work Agreement. Based on production and FFB processing record, it was informed that FFB supplier third parties for BPMM are PT Meganusa Intisawit (PT MNIS), PT Agrotunggal Jayamandiri and PT Kharisma Riau Sentosa. The former supplier was the only supplier which already RSPO certified. A valid FFB transaction and processing agreement of those supplier were available.

Status: Comply

4.2

Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

4.2.1 & 4.2.3

Procedure (SOP) of soil fertility management was presented in document No. SOP/SMART/MCAR/IX/TA-PPK about manuring and document No. SOP/SMART/MCAR/X/TA-PTB about field upkeep on immature areas. The SOP has mentioned that leaf sampling for annual manuring program purposes shall be conducted annually, while soil sampling should be taken every five years. Both sampling is carried out by SMART Research Institute (SMARTRI) team.

Leaf sampling analysis results period 2017 for BSNE and BPLE which presented in documents No Ref.004/RFC-Indragiri/SMARTRI/RISET/III/17, and No Ref.005/RFC-Indragiri/SMARTRI/RISET/III/17, dated 24 March 2017. Furthermore, soil analysis results for BSNE and BPLE were presented in documents No. Ref.008/ SMARTRI-BPME/R-Lab Libo/6/2013 dated June 16th 2013 and Ref No. Ref.010/ SMARTRI-BPME/R-Lab Libo/6/2013 dated June 16th 2013, respectively. According to manuring recommendation program in 2017 and 2018, it could be concluded that calculation of fertilizer rates were derived from leaf and soil analysis. Actual time of application has follows the schedule recommended by SMARTRI Agronomist.

4.2.2 & 4.2.4

Records of fertilizer application was presented in document of fertilizer recommendation and realization 2017 and Division work program. Fertilizer recommended in 2017 are Urea, Rock Phosphate (RP) and/or Triple Super Phosphate (TSP), Muriate of Potash (MOP), Kieserite and/or Dolomite and Borate, as source of N, P, K, Mg and B, respectively. Apart from chemical fertilizers mentioned above, by-product of bunch ash has also applied in BPLE with rates about 4.00 to 5.50 kg/palm, and has applied in BPLE is 2172.11 ton . According to interview with estate and mill staff, it was stated that only bunch ash, a by-product which actually applied on the estate fields for nutrient cycle purposes. For the period of 2017 fertilization has been completed 100%. Furthermore, in order to enhance soil pH, about 406.10 ton and 354.36 ton of Kaptan (CaCO₃) had applied in BSNE and BPLE, respectively. Base on observation in BPLE and BSNE the palm residues after replanting has been chipping and staking

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1; 4.3.2 & 4.3.6

The company has soil map which derived from soil survey semi detail conducted by Plantation Monitoring and Planning Division (PMNP) in 2007, Reg. No. 447/202/PMNP/VII/2007 for Bumi Palma, Bumi Lestari and Bumi Sentosa Estate. Maps were in scale 1:25,000 and 1:50,000. According to map, it could concluded that all estates has covered by 100 % peat soil with shallow depth category, ranged from 1.50 to 3.00 m. Moreover, slope within estates in PT BPLP operational areas were clasffied as flat (0-3 %). This is confirmed during field observation to BPLE and BSNE. Overall, it could be

concluded that soil suitability has classified as marginal for oil palm cultivation with limitation factor on the presence of peat soil which may lead to soil low fertility and poor drainage properties. To overcome those limitation factors, several strategies has been conducted, such as soil compaction, hole in hole planting and water management through installation and maintenance of field drain system with 1:16, 1:8, 1:4 or 1:2 patterns (depend on field conditions), as well as water level, water table and peat subsidence monitoring. Furthermore, in order to enhance soil fertility level, application of fertilizer towards leaf and soil analysis has also conducted by SMARTRI Agronomist.

4.3.3

The CH has two type of transportation. FFB from owned estates (BPME, BSNE and BPLE) were mostly transported through peat canals system while FFB from outside-grower, several owned estate blocks and CPO were transported through ground-based road. Both transportation system has maintained for smoothness of FFB and CPO transportation.

The CH was able to shows canal desilting program and realization in BSNE and BPLE for period 2017 which presented in work program division report. for example, for BPLE has been doing 104,247 meters and BSNE 100155 meter of canal maintenance . Based on field observation to BSNE and BPLE, it was found that both canals and road conditions were well maintained and easily passable.

4.3.4

Procedure on peat management has presented in SOP of planning on new planting area and SOP of new land clearing. Both procedures mentioned that in order to minimize peat subsidence and peat overdrain, water level management on 50-70 cm, water table monitoring through piezometer, peat subsidence poles monitoring, Watergate installation and drains or canals desilting were compulsory to be conducted. According to document reviews, it could be concluded that the company procedures has adopt RSPO manual on BMPs for existing oil palm cultivation on peat 2013. Moreover, Indonesian regulations related to peat management such as Indonesia Forest Moratorium 2011, Presidential Decree No. 32/1990 and Minister of Agriculture Decree No. 14/2009 were also adopted.

During wet season when rainfall is more than 250 mm/month where noted in october and november 2017, water level was approximately in 40 cm. This is carried out as anticipation strategy on facing drought season (rainfall <100 mm/month) which predicted might be appears in may - july 2017. During drier months, water level has maintained in level 50-70 cm. It was reported in RKL/RPL Semester 1 and 2 that there were no floods and canals water deficit in all estates during 2017.

The company has installed 38 points of subsidence and piezometer points in accordance with the Decision of the Director-General Of Pollution Control And Environmental Damage Number SK.64/PPKL/PKG/PKL.0/11/2017. Based on field observation of piezometer to Block H3 BPLE and Block G 01 BSNE, it was found that piezometer and measurement instrument conditions were seems well maintained. At the time of visit, water Table measured were about 40 cm.

Subsidence poles in BSNE has installed in 8 point and BPLE is 15 point. Subsidence monitoring records from July to December 2017 informed that during 6 month , the difference of peat subsidence scale were about 0,7 cm or 1,4 cm/year. These figures were still bellow Minister of Environmant Regulation (PermenLH) No. 7 year 2006 threshold (35 cm per five years or about 7 cm/year). Based on field observation to subsidence poles, it was found that poles were installed on the harvesting path and inter palm. Its conditions were satisfactory maintained and installed firmly into the mineral substratum. Moreover, soft grasses has looks maintained to retain soil moisture on the field.

4.3.5

The Company has demonstrated the assessment of the drainability assessment of oil palm plantations of PT Bumipalma Lestari persada. Based on the results of the study conducted can be concluded several points, namely:

- The drainability assessment activity at PT BPLP is done by approaching condition analysis of peat characteristic and drainage / hydrological condition with study area boundary of HGU BPLP Area
- The drainability assessment in PT BPLP is done by approaching rainfall data analysis, distribution and channel dimension, river network, ground water level and zonation of water governance. For water management zonation in PT BPLP is divided into 5 zones. available zonation maps of water governance and flow direction of PT BPLP.
- Projected future peatland drainage conditions related to the viability of oil palm plantation activities in PT BPLP are conducted with an analysis Drainage Limit Time (DLT) approach each zonation. Referring to the analysis

result, it is known that from every zone 1 of 176.47 year zone 2 is 137.61 years, zone 3 is 468.75 year, zone 4 is 468.75 year and zone 5 is 468.75 year. Then the area can still be used for production activities (in the case of replanting)

The main drainage problems that occur in PT BPLP are the water supply (water supply), the loss of water (Water Loss) and overcapacity or flood. Water resources management and drainage problem solutions are carried out by (1) operational water management and (2) drainage problem solution (through channel maintenance and infrastructure development for water management)

Status: Comply

4.4

Practices maintain the quality and availability of surface and ground water.

4.4.1

High conservation values identification on 2012 and Environment Evaluation Study (SEL) report indicates there is no springs and river stream on entire company operational areas. Water sources that identified were surface canal water on estates.

PT BPLP also shown drainability assessment on 2018 as long term water management plan, this assessment consist of water management plan such as : water management Re-Zoning, stop block and watergate installation, flooding areas re-mapping, canal management for optimum water intake. According to environment monitoring program analysis, it was informed that the company activity has not affect the value of BOD and COD in the downstream, since the figure in the upstream is already above the standard required. Moreover, domestic housing well and consumption water from reverse osmosis testing analysis shows that all parameters are still relevant with standard quality.

4.4.2

Based on semi detil soil map with 1:25000 scale indicates there is no river stream on entire company areas. Field visits on replanting areas block G5 Bumi lestari estate and block H8 Bumi Sentosa estates found that company has maintained water level between 75 cm and cover crops on field and ground cover on canals are growing well.

4.4.3

Field visit on Bumi Palma Mill WWTP and mill effluent discharge point and interview with environmental agency indicates there is no environmental pollution caused by POME discharging activities. Bumi palma Mill has 16 waste water treatment plant and regularly conduct waste water testing every month and then waste water discharge to water bodies based on Decree Head of capital investment and integrated services Indragiri Hilir Regent No 503/DPMPSTSP-IPAL/08 on October 20, 2017 valid until 2022.

4.4.4

Based on water use data for the period of 2017, it can be concluded that the average water use for processing is 0.57 m³ / ton FFB. this value is still below the company's defined budget of 1.23 m³ / ton FFB. Based on field observations to WTP stations, flowmeter found for domestic use and processing has works well. The recording book of daily flowmeter can be shown by the WTP operator upon observation.

Status: Comply

4.5

Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.

4.5.1

The management unit of Bumi Palma Estate has a program related to holistic pest management, such as:

- Detection (consisting of detection, reporting detection, report verification and IPM (Integrated Pest Management))
- Census (consisting of census execution, census reporting, report verification and follow-up, as well as recommendation requests from SMARTRI)
- Recommended Control
- Control based on SMARTRI recommendation
- Evaluation and Follow-up

The program of beneficial plants (*Turnera subulata*) as a predator of leaf eating caterpillar in BSNE and BPLE who has realized 100% in accordance with the program. Based on the results of field visits auditors in Block G01 BSNE and Block

H3 BPLE useful plants has been well maintained.

Based on the results of the census there are attacks *Oryctes* (rhino beetle) in 2017 planting year in BSNE. the company has taken action control measures through the implementation of Pherotrap of 147 units. And based on the results of periodic observations based on the results of the census recap of February 2018 known oryctes attacks have decreased with the attack rate below 0.5%.

Monitoring of rats attack has carried out regularly every three months. Based on data recapitulation of rat census in BSNE and BPLE during 2017, it was informed that there are no rat attack that are above the economic threshold (5 %). For biological control, barn owl has adopted by estate management.

4.5.2

IPM Training was held on April 13, 2017 to supervisor and census workers. This training was conducted that the workers understand about the integrated pests management. The material presented by SMARTRI on the theme pest management, control of fire caterpillar, rats, *Oryctes*, and can distinguish the characteristics of ganoderma attacks on oil palm plantations. The training activities were attended by 14 representative employees from all over the estate. Based on interviews with census workers in Block H3 BSNE, it was known that workers understand the procedure IPM such as technique of census, time of census, economic threshold, etc.

	Status: Comply	
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4.6

Pesticides are used in ways that do not endanger health or the environment

4.6.1

The Company has a commitment to eliminate use of paraquat through memorandum No.032 / PD / VIII / 2016 dated 13 August 2015 from the President Director. The Company is committed in the preparation of the 2018 budget already eliminated the use of paraquat. In addition to avoiding the development of resistance is the implementation of integrated pest management. The company also implemented a policy that the use of pesticides is only applied to the target species in accordance with the rules of the product, pesticide used by CH has meet with regulations ie:

- a. Erkaforon 20 WG (adhesive for all types of weeds) permit no RI. 01030120134861, valid until 12 December 2018
- b. Rolifos 150 SL (broadleaf weeds) permit no RI010301201368313, valid until 13 May 2020
- c. Roll up 480 SL (narrow-leaved weeds). permit no RI01030120042133, valid until 31 Desember 2018

All pesticide mentioned above, were listed on pesticide book of Pesticide Commission 2016. Based on interviews with workers spray is known that the use of pesticides is the appropriate dose contained in the product and adjusted to predetermined targets.

4.6.2

The Company has documented records of pesticide toxicity (LD50) in the document of Pesticide Toxicity Data on 2017 (BPME and BPLE). The document is recorded the data of pesticides toxicity every month. For example, toxicity data for the month of November 2017, the active ingredient is *isopropylaminaglifosat* LD50 5000, 0.48% Active Ingredients, the number of applications of 348 liters, the total active ingredient per ton FFB 1.89 . This document is constantly recorded and updated by the sustainability officer of estate each month.

4.6.3

The Company has a commitment to eliminate use of paraquat through memorandum No.032 / PD / VIII / 2016 dated 13 August 2015 from the President Director. Until ASA- 4 The Company is committed in the preparation of the 2018 budget already eliminated the use of paraquat. The management unit always tries to implement the utilization of proper herbicide, which is based on target, time and dose. The efforts such as operations unit has Material Safety Data Sheet (MSDS) for each type of agrochemical material include pesticide, that explains the storage direction and material handling, the handling in case of accident (first aid efforts), identification on hazards, actions over spilland leakage, Personal Protective

Equipment(PPE), physical and chemical nature, reactivity and stability, toxicology information, ecology information, waste disposal and transport. MSDS has been placed in herbicide storing place, warehouse and spraying equipment washing station. Based on document review and interviews with management, it could be concluded that there is no prophylactic use of pesticides for pest management control. Pesticides has only used for weeds control.

4.6.4

Operations unit has documented type of pesticide used, such as document on 2018:

No	Product Name	Active Material	The convention	Stockholm	Class WHO
1	Erkafuron 20 WG	Metil metsulfuron 20 %	-		
2	Rolifos 150 SL	Ammonium Glofusinante 150 gr/ltr	-		II
3	Roll Up 480 SC	Isopropil amina glifosat 480 g/l	-		

4.6.5 & 4.6.9

Based on field observation and interview with foreman and applicator pesticide in Block H3 BPLE, its known that supervisor and personnel have understood the work instruction related to a proper herbicide application process, understood and knew chemical and hazardous symbols, understood the prohibition to apply herbicide in riparian area or conservation area and could demonstrate proper work procedure based on the applicable regulation within company's operation area. The company has shown evidence of chemical handling training and MSDS conducted on 13 April 2017 at BSNE followed by 20 employees, proof of absence of activity execution, and training using Indonesian language. Based on document review and interviews with pesticide applicator at BPLE, the PPE for spraying team has been provided by CH and utilized by workers

4.6.6

Procedure of material management (including agrochemicals) and material movement has presented in document SOP/SMART/LEMS-EHSD/SADV//006 which covers ex pesticide containers collection and recording. Based on document review and field visit on chemical storage shown that during 2017-2018, company only use 3 types pesticides (erkafurone, roll up, and rolifos) and all of this pesticides are produced by Rolimex. Based on MSDS, ex pesticides containers are allowed to be used for the same purposes over 3x washing .

Base on field visit in Chemical warehouse of Bumi Lestari Estate and Bumi Sentosa estate found, there are signboards and hazardous symbols maintenance chemical by category, Material Safety Datasheet (MSDS), chemical logbook, emergency response, personal protective equipment and OHS management.

All of ex pesticides/agrochemicals containers were kept temporary storage and then returned to related producer i.e PT Rolimex Kimia Nusamas. Document review found that company have shown proper ways for ex agrochemicals disposal, for examples "ex agrochemical containers delivery notes from estates to Rolimex on January 2018". Field visit during audit on estate housing also found there is no ex agrochemical containers usage for other purposes.

4.6.7

The application of pesticide in the field has been following the method, which will minimize the negative risk including the direction to choose pesticide, to store pesticide, to use pesticide, such as the chosen pesticide formula should be based on the target because one pesticide formula is only effective for one specific target. Based on PPE Warehouse field visits and Pesticide Mixing sites. known to have been equipped with several facilities, among others: the mixing pesticides, work tools and PPE storage, washing area for PPE and bathroom

4.6.8

Based on a review of documents and interviews with management staff, the company did not perform the application of pesticides from the air.

4.6.10

Field visit on Bumi lestari and bumi sentosa estates shown that agrochemicals containers are disposed based on MSDS i.e cleanly washed on pesticides optimalization storehouse and regularly submitted to producers i.e PT Rolimex Kimia Nusamas (last shipment conducted on January 2018). All evidence for ex agrochemical disposal for examples "**berita acara pengiraman bekas kemasan pestisida**" to related supplier are available and verified by auditor . Both estates,

Bumi lestari estate and bumi sentosa estate were implemented proper ways for waste disposal based on procedure SOP/SMART/LEMS-EHSD/SADV/I002.

4.6.11 Major

Medical supervision is conducted through periodic health checks to high-risk workers, one of which is chemicals-related work. The last medical examination was conducted on January 15 to 16, 2018. From the results of the medical examination (Cholinestrase), all spray workers are still in normal condition.

The results of interviews with spray workers and labor union were known that the health checks for workers who handle pesticides are done periodically every 6 months. Based on the results of these interviews, it was known that the results of medical examination have been submitted to workers with the results were still in normal condition.

4.6.12 Major

Still the same as the previous assessment, the company has policy that states that women workers in pregnant and breastfeeding conditions are prohibited from handling pesticide-related work. The policy was contained in the VPA Memorandum of PSM 5 No. 001 / SE / VPA5 / 12/08 dated December 20, 2008 stating that company does not allow pregnant and lactating female workers to be employed as spray worker.

The result of the verification of the spray workers list and field visit in block H3 Bumilestari Estate (spraying activity) it was known that there was no female spray workers. The spray workers both in BPLE and BSNE are all men with the number of: BSNE: 19 workers and BPLE: 10 workers.

Status: Comply

4.7

An occupational health and safety plan is documented, effectively communicated and implemented.

4.7.1

There is no revision over occupational health and safety policy in PT Bumipalma Lestari persada. The policy has been implemented based on the applicable regulation. Field visit and interview in mill and estate revealed that the occupational health and safety has been socialized and implemented by company through Socialization with personnel during muster morning before work, signboard / posters and others.

Meanwhile based on documents verifications and field observations its known if the certificate holder has had the documents related the implementation of OHS Policy such as:

- SOP *Identifikasi Sumber Bahaya, Penilaian Dan Pengendalian Risiko* (SOP/SMART/HESS-EHSD/SADV/I/002)
- SOP *Manajemen Alat Pelindung Diri* (SOP/SMART/HESS-EHSD/SADV/I/010)
- *Identifikasi Sumber Bahaya, Penilaian dan Pengendalian Resiko* (form of Source Hazard Identification, Assessment and Risk Control) Period of January – December 2018 (F/SMART/HESS-EHSD/SADV/002/002)
- Action plan and Review of “*Identifikasi Sumber Bahaya, Penilaian dan Pengendalian*” Period of January – December 2018 (F/SMART/HESS-EHSD/SADV/002/003).

OHS program of PT BPLP in the period of 2017 include: monthly meeting, OHSAS documentation, training and counseling, health and monitoring of Industrial hygiene, ergonomic, and health, a review, target achievement, and OHS management review.

4.7.2

The Certificate Holder has performed the identification and assessment of risks to each operational activities described in "form of Source Hazard Identification, Assessment and Risk Control (ISBPPR)". The document informs about the type of activity, type of work (routine, non-routine and emergency), source / event, impact, existing controls, the level of probability, severity and risk level. In these identifications including hazard and risk of any part or operation unit at the mill and then presented the control that has been done and the risk analysis that may still appear after the controls so it is necessary to control the rate conditions continued until the risk can be accepted by the management. The results of the risk assessment have been informed to the employees in accordance with the job. Based on interviews with estate and mill

workers obtained information that the employee has known the potential of dangers that arise on the job. The results of the field visit at the mill, it is known that in each station has been installed document of the risk analysis.

4.7.3

Result of field observation in Mill and Estate and interviews with personnel's, it is known that the management unit has provided PPE and have been given training in safe work practices. This was evidence that the personnel's have understood their duties and responsibilities and also can demonstrate how to work correctly and appropriately in accordance with the procedures. Furthermore based on field visit in estate and mill and interview with personnel, it is known that the management unit has provided PPE for personnel for each job type according to the potential of the existing risk.

In the SOP *Manajemen Alat Pelindung Diri* (SOP/SMART/HESS-EHSD/SADV/II/010) stated that the requirements provisions in PPE such as PPE exchange if it broken with the requirements that the employee can showed the broken PPE before exchanged for a new one. This is in accordance with the results of interviews with the employee such as officer of POM grading, processing operator in the POM, harvest workers, sprayers and fertilizer who recognized that the broken PPE will be exchanged with the new one.

4.7.4

The Certificate holder has guiding committee for occupational health and safety organization and personnel in charge on implementing the occupational health and safety program. Guiding Committee of Occupational Safety & Health Board has drafted an OHS working program and evaluates the implementation of OHS program in the field. In order to ensure that the OHS program has been implemented effectively, the board of Guiding Committee of Occupational Safety & Health performs a monthly meeting with workers.

The interview result with Manpower and Transmigration Agency in Indragiri Hilir District revealed that the management unit has submitted the guiding committee for occupational health and safety's periodic report every 3 months. The guiding committee for occupational health and safety report covers the entire occupational health and safety activity within company's operation activity. OHS guiding committee meeting has been held regularly once a month at mill and estate with the theme of Health, Safety and Welfare.

4.7.5

The certificate holder has had the procedure for emergency response, for example Procedure of First Aid, Procedure of Handling Accidents and Work Diseases and Procedure of Emergency Preparedness. Based on field visit, company has pointed the evacuation path and concentration point in order to smooth the evacuation process in emergency situation. The evacuation path is available in office and mill and has been completed with map and other *signboards*. At the time of the field visits it is known that in the mill, warehouse, workshop and division offices have supplied First Aid box which monitored regularly. As for the operational activities in the field, supervisors was carrying first aid kits during his work in the field, and mill was also equipped with first aid kits.

Based interviews with the supervisors also suggested that they all have the proper knowledge on how to perform first aid emergency in case of any occupational accident at their work area. For example, when a worker is exposed to tree's thorns, the first step to take is to clean the injury and perform first aid emergency, then the supervisor must take said worker to the estate's policlinic for further treatment. The company also perform monitoring of work accidents and investigating in case of work accident contained in the document of incident notifications and document of incident investigation *reportable* from the accidents. Based on documents review and interview with company doctors its known in 2017 there is no work accident in PT BPLP

4.7.6 Minor

Company showed evidence that all workers are covered by medical services and accident insurance. For example, Evidence of payment BPJS employment include :

- Payment of BPJS (Mill) with transaction code 17122323880599.
- Payment of BPJS (Bumi Lestari Estate) with receipt code no. 18020606488097.
- Payment of BPJS (Bumi Sentosa Estate) with receipt code no. 18020806509675.

In addition, the company also provides clinic as early medical aid in case of work accident. The results of interviews with workers and labor union were known that all workers have been included in the BPJS program.

Result of verification of work accident report, interview with management and labor union was known there was no work accident in the last 1 year. So there was no example of BPJS claims in the past year.

4.7.7

Certificate Holder is consistently conducting monitoring over work accident, which reports the complete information about accident, such as the month of the accident, number of case, the accident's location, type of accidents, the impact, working hour losses, the accident cause, follow up action and result. Monitoring of work accidents performed every month and reported to the relevant agencies in conjunction with regular reports of Guiding Committee of Occupational Safety & Health. Based on documents review and interview with company doctors its known in 2017 there is no work accident in PT BPLP

Status: Comply

4.8

All staff, workers, smallholders and contractors are appropriately trained.

4.8.1

Certificate holder has had the identification of personnel competence matrix unit year 2018. The training is intended for the whole staff, workers from employee status monthly, daily employees, freelance and contract employees. The training programme has covered all aspects of the RSPO principles and criteria, OHS awareness, FPIC concept in the process of compensation and conflict resolution, environment, good agricultural and manufacturing practices, etc. Furthermore, from the matrix structured training program and plan time to be implemented. The training is intended for the whole staff, workers from employee status monthly, daily employees, freelance and contract employees.

4.8.2

Certificate holder has had a worker training records for each unit stored in personal files. Based on interviews with workers it is known that workers have been trained and understand in accordance with the work being performed. Contractors has been involved in several training such as Socialization of GSEP Policy, Business ethical, PPE and OHS in workplace on 29 August 2017

Status: Comply

PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity

5.1

Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

5.1.1

The Company has an environmental document such as Environmental Evaluation Study, approved by EIA Commission of the Ministry of Agriculture No.RC.220/713/B/ V/1993 on 1993. This EIA document are coverage 8000 ha study areas and 30 tonne FFB/hour POM capacity. The matrix of Environmental Management Plan/Environmental Monitoring Plan include the changes in hydrology, water quality degradation, Hazardous waste management, solid waste disposal, noise, and air quality, landfire prevention, increased pests and plant diseases, job creation and increasing revenue for community.

5.1.2

Since 2016-2017 company has conduct replanting on bumi lestari and bumi sentosa estate. For this reason, companies develop new EIA addendum covering replanting activities and planning for Bumipalma mill capacity upgrading from 30 tonne FFB/hour to 45 FFB tonne/hour. Company has conducted environmental management based on documents of Environmental Management Plan/Environmental Monitoring Plan. Records of implementation for Environmental

Management describes on in RKL-RPL implementation report 2nd semester 2017 and has been reported to environmental agency for regular basis.

5.1.3

Company done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring for regular basis. These report described realization of monitoring and management of the environment in accordance with environmental parameters in the RKL/RPL. Public consultation with Environmental agency of Indragiri Hilir indicate that the company has made environmental management and there is no issue of pollution caused by the company's operational activities.

Review for environmental monitoring/management plans have been developed and listed on RKL/RPL management review document conducted on 30 January 2017. For examples, related to replanting activities shown that company has properly managed and reduced all impact caused by plantation activities for examples zero burning activities and etc.

Status: Comply

5.2

The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced

5.2.1

Until ASA-4, there is no changes with HCV identifications. Certificate holder has conduct HCV assessment which carried out by Biodiversity and Conservation Sustainability Division (RSPO approval HCV accessor) in 2012, presented in HCV report of HCV Identification PT BPLP dated February 2013. Peer review of the report had carried out in May 8th 2013 by Dr. Nyoto Santoso while public consultation had carried out in may 11th 2013 in, attended by 40 stakeholders.

Based on HCV identification there were identified two HCV attributes, i.e. HCV 1.2 on protected species and HCV 6. Based on HCV 1.2 identification, it was informed that there were eleven, eight and one fauna species listed in PP No. 7 year 1999 as protected, Appendix II CITES and IUCN with vulnerable category, respectively. Furthermore, HCV 6 has Identified in Block H09/H10 Div. 2 Bumi Palma Estate as local cemetery covered 0.50 ha areas and has been mapped in 1:50,000 scales.

5.2.2

Based on HCV identifications, interviews with workers and related agency during audit, and field visit found there is no species in PT BPLP operational areas categorized on RTE status. However, Companies has HCV management plant 2018 program, as follows for examples: regular species monitoring, HCV socialization to workers / communities, regular patrols for HCV areas and landfires activities.

Field visit on block H10 bumipalma estates shown that company provides HCV information signboards and marking those areas for local cemetery. PT BPLP also conduct regular inspection for HCV/RTE species protection, last inspection was done on January 2018 indicates there is no RTE species, no wild hunting and no animal traps presence on HCV areas.

5.2.3

Company has established policy regarding species protection listed on Head of upstream policy 2015. Evidence for workforce education related to species protection are available for examples HCV Socialization for Bumilestari estate workers on may 2017, and socialization for Pebenaran villagers on May 2017. Based on interview with public figures from Lintas Utara and Sungai Rukam vullages, it was state that companies has conducting socialization on HCV area and protected fauna within estates operational areas which also informed by signboard. Moreover, field visit on bumilestari and bumi sentosa estates housing found there is no wild species reared by workers

5.2.4

Company have established HCV management plan, and implemented it well. Regular patrols record shown company has been monitored illegal fishing, hunting, and other illegal activities. All of records for monthly patrols on each estate are available and verified by auditors. As the results of 2017 monitoring output, company has plan feed back into the management plan 2018 for examples enhance socialization for all workers related to wild species every semester.

5.2.5

Interviews with local communities found that the presence of HCV 6 on block H10 bumi palma estates was not overlapped with local communities' rights. Auditors team found that cemetery areas has not planted by oil palm trees and those place

has been marked properly.	
Status: Comply	
5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.	
5.3.1	
<p>All waste products and sources of pollution have been identified and documented in identification and evaluation of pollution source document issued on 2017</p> <p>Type of waste been identified for examples are :</p> <ul style="list-style-type: none"> • Estates, waste source : chemist activities, waste type : ex pesticides containers (toxic and hazardous waste) • Mill, waste source : FFB process, waste type : shell and fiber (non toxic/hazardous waste) • Estates, waste source : pruning activities, waste type : oil palm fornd (organic waste) 	
5.3.2 & 5.3.3	
<p>Inventory for all chemicals usage and it containers are available on chemicals storehouse / temporary hazardous storage. All ex chemicals containers were kept on temporary hazardous storage at Bumipalma mill and the company has a permit for hazardous and toxic waste storage issued by decree of Head of Capital investment and integrated services Indragiri Hilir regent No.503/DPMPTSP-IPSL.B3/4 on 2017, valid until 2022.</p> <p>Based on document review and interview with management representative, shown all ex pesticide containers on estates are managed by 3 times washing in accordance with the MSDS, then stored in the pesticides optimalization store and regularly submitted to supplier (PT Rolimex Kimia Nusamas)</p> <p>Document review shown that company has sent all toxic and hazardous waste to PT Primanru Jaya (licensed collector by decree of national environmental minister) on December 2017 (manifest are available and checked by auditors). Observation during audits at temporary hazardous&toxic waste storage shown that all of hazardous waste are compliant with the periods in permit.</p> <p>All settlements waste are not disposed using open fire, certificate holder are provides landfill for domestic waste management. Field observation on block G3 bumi sentosa estates and block G5 bumi lestari estates for example, found that companies managed settlements/housing domestic waste by provide landfill on each division and sort the organic/an-organic waste. Observations also found these landfill are located far away (> 1 km) from housing and situated on flood free areas.</p>	
Status: Comply	
5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.	
5.4.1	
<p>PT BPLP has assess and estimated the direct energy use such as fuel usage by operational activities for 2017 periods. Company shown commitment to reducing fossil fuel by renewable energy usage. Shell and fiber usage have been monitored per month and realization of fossil fuel usage during December 2017 are 19503 litre. During Jan-Dec 2017, fiber and shell usage for boiler resulting average energy efficiency for diesel fuel are 10.33 litre/tonne CPO, for electricity are 120.30 kWh/tonne CPO.</p>	
Status: Comply	
5.5 Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice.	
5.5.1 & 5.5.2	
<p>Based on Sinarmas Technical Guidelines for Palm Oil Cultivation point 5 on land preparation and planting (SMART / MCAR / 05 / 05-07) states that in the context of land preparation should use the principle without burning (Zero Burning)</p> <p>Replanting activities carried out by the principle without burning, as implemented in the Employment Agreement on April 15th, 2016 on behalf of the contractor CV. Bintang Merah (SPK No. BPME / JKTO / 04/16/008. Replanting) for Division 1 and Division 2 BPME with an area of 337.56 hectares. Details of its activities are Chipping rod plant = 337.56 Ha; unloading dead trees / point blank = 337.56 Ha; make the planting hole with a standard 160 trees / ha: 337.56 Ha; create a trench with a size of 1 x 1 x 1 m: 67 512 meters.</p>	

Based on field observations in Bumi Sentosa Estate and Bumi Lestari Estate its known if the company did not use burning methode when replanting activity.

Status: Comply

5.6

Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

5.6.1; 5.6.2

To reduce pollution and emission, the company has identified the pollution sources and emissions and the management steps which are described in SOP of Waste Management. In addition, company also identified GHG sources included management plan for reducing it. Monitoring for emission and pollutants (air emission, air ambient, odor, noise, and vibration) from estate and mill was done periodically every semester, covered on RKL/RPL implementation report and reported to environmental agency periodically. 2nd Semester 2017 testing result indicates all parameters related to emission are still comply with standard quality.

All waste including emmissions and pollutions sources from Mill and estate are identified and recorded on waste and pollution identification risk 2018 document. Fossil fuel reducing have been implemented by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring periods October - December 2017sighted that all of waste water testing parameters is compliant to the standards quality. Based on field visits in the boiler station any a fiber and shell is used as fuel. Remaining fiber shell and placed so did not result in pollution and potential fire. Base on field visit in landfill, Bumi Lestari Estate is known there are not ex pesticide containers disposed in landfills and be divided organic and an organic trash.

5.6.3

Monitoring for emission and pollutants (air emission, ambient, odor, noise, vibration) from estate and mill was done periodically every 6 month, covered on RKL/RPL implementation report and reported to environmental agency peridically. Company also conducted GHG calculation for June 2016 – July 2017 period based on RSPO GHG palm V 3.1 and this calculation have been reported to RSPO by email on February 13th 2018. The calculation of GHG emissions resultng as below:

Data PalmGHG Summary Report

Mill: Bumipalma Mill

Company: PT. Bumipalma Lestari persada

Year of Assessment: June 2016 – July 2017

District: Kec. Tempuling, district of Indragiri Hilir

Country: Indonesia

Final Emissions value per product

Product	tCO2e/t product	Product	tCO2e/t product
CPO	10.51	PKO	0
PK	10.51	PKE	0

Overall emissions summary

	Own crop	Group	Outgrower
Total field emissions (tCO2e)	390562.64	0	9152.9
Total mill emissions (tCO2e)	15021.69	0	0

Summary of Net GHG Emissions Bumipalma mill

Emissions per Product	tCO2e/tProduct
CPO	10.51
PK	10.51

Extraction	%
OER	20.99
KER	4.98
Production	t/yr
FFB processed	152029.23
CPO produced	31912.78
PK Processed	7566.26
Land Use	Ha
OP planted area	
OP planted on peat	6082.55
Conservation (forested)	
Conservation (non-forested)	
Total	6082.55

Summary of Field Emissions and Sinks

	Own Crop		Group		3 rd Party		TOTAL	
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha
<i>Emissions</i>								
Land Conversion	60075.09	9.88	0	0	0	0	0	0
*CO₂ Emissions from Fertiliser	4709.03	0.77	0	0	0	0	0	0
**N₂O Emissions	49906.23	8.2	0	0	0	0	0	0
Fuel Consumption	712.85	0.12	0	0	0	0	0	0
Peat Oxidation	332107.23	54.6	0	0	0	0	0	0
<i>Sinks</i>								
Crop Sequestration	-56943.21	-9.36	0	0	0	0	0	0
Conservation Sequestration	-4.58	0	0	0	0	0	0	0
Total	390562.4	64.21	0	0	9152.9	0	0	0

Summary of Mill Emissions and Credits

	tCO ₂ e	tCO ₂ e/tFFB
Emissions		
POME	14001.22	0.09
Fuel Consumption	1020.47	0.01
Grid Electricity	0	0
Utilisation	0	0
Credits		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	15021.69	0.1

Palm Oil Mill Effluent (POME) Treatment

Divert to compost	0 %
Divert to anaerobic digestion	100 %

POME Diverted to Anaerobic Digestion:

Divert to anaerobic pond	100 %
Divert to methane capture (flaring)	0 %
Divert to methane capture (electricity)	0 %

generation)	
Status: Comply	
PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills	
6.1 Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate the continuous improvement.	
<p>6.1.1 Major & 6.1.2 Major The company has done social impact assessment in 2013 by social impact assessment - CSR Department Sustainability Division by involving of affected parties. The social impact document explain of negative and positive impact for estate and mill operational with their recommendation for managing and monitoring its impact in form of social impact managing and monitoring matric. The SIA document was analyzing of local worker opportunity, worker welfare, economy improvement in the surrounding village, improvement of stakeholder activity, education, religion and health. Evidence of surrounding parties involving in social impact assessment was also showed by the document of social impact meeting on May 11, 2013 which was attended by surrounding stakeholder and also in form of questioner to KaryaTani and Suhada village.</p> <p>6.1.3 Major In effort to increase positive impacts and decrease negative impacts, the company has performed review and consultation with stakeholders who directly affected through regular meetings. It was demonstrated and well documented in document of Management and Monitoring Plans of Social Impact Assessment for period of October 2017 – September 2018. The plans have included a clear implementation schedule (1 year), and the person who is responsible for the implementation. These plans have been implemented as evidenced by documentary records and field observations.</p> <p>6.1.4 Minor & 6.1.5 Minor The company has performed evaluation of social impact analysis peridocally. Review of the Social Impact and Monitoring Plan for the period 2015-2017 was conducted on August 2017. The review conducted by involving affected parties among others: - The attendance list on August 22 – 29, 2017 which was attended by several representatives of internal stakeholders and villages such as Lintas Utara village, Pebenaan Village, Suhada Village, Sungai Rukam village, Bagan Jaya village, etc.</p> <p>That was reaffirmed in accordance with the results of interviews with surrounding village communities and all issues have been raised in SIA document. Based on result of interview was also reveals that there are no smallholders scheme.</p>	
Status: Comply	
6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.	
<p>6.2.1 Until ASA-4 there is no changes related to Communication and consultation procedures. The company has SOP Communication and Consultation SOP/SMART/ UMUMSADV/I/004, established by the Sustainability Division Head and approved by the Head of Upstream. This procedure explains to the user about handling communication and consultation related principles and requirements sustanability Palm Oil (SPO) in each operational area palm oil company PT SMART Tbk. This procedure includes guidance in planning, implementing, regarding communication and consultation among stakeholders. Interviews with relevant stakeholders for examples Indragiri Hilir manpower agency and enviromental agency indicates they known how to communicate wth companies based on company existing procedures.</p>	

6.2.2

According to the SOP/SMART/ UMUM/SADV/ I / 004, Rev.0.0, the CH has appointed estate manager and mill manager as person in charge of social which duty and responsibility is to update the list of stakeholders of any changes or at most once every 6 months. List of stakeholders is updated when company have been contacted by relevant new stakeholders no listed on current list. The PIC of social/CSR officer is also responsible to top management for the implementation of the process of communication and consultation with stakeholders including the dissemination of the list of documents that can be accessed by stakeholders

6.2.3

There is no stakeholders list changes for 2018 periods. The company shown the list of stakeholders updated in 2018 consisting of government agencies, universities, surrounding villages, workers' organizations, public figures, and etc. Based on the interviews with the company, the stakeholders list is updated whenever there is a change or a maximum of 6 months. Record of communication from external stakeholder is also available at estate and mill in form of communication book. Document review for examples Bumisentosa estates communication book periods 2017 show there is eight incoming letter from stakholders (all this incoming letter are request for fund), and have been responded by companies.

Status: Comply

6.3

There is a mutually agreed and documented system for dealing with complaints and grievances, which is Implemented and accepted by all affected parties.

6.3.1 Major

The company has SOP No. SOP/SMART/SIGS-CSR/SADV/II/003 about Handling Complaints and Dissatisfaction. Completion of grievances or dissatisfaction within the Grievance Mechanism consists of several settlement steps. Started from the Chief of Administration who is tasked to receive reports of complaints and dissatisfaction, and continued with the completion by Head unit level, RC/PC, and VPA/VPM/CEO. In the SOP also explained about the protection of whistleblower. Grievances can also be communicated through labor union in the company. The procedure has been socialized to stakeholders. It shown in the socialization monitoring document for example documentation of socialization on August 2, 2017 attended by 53 participants and from interviews with stakeholders such as harvesters and warehouse officer and representatives of Bagan Jaya Village, Pengalihan Village, etc.

6.3.2 Major

The company has a complaint logbook document for each unit. Throughout 2017 there are no internal and external complaints at Bumi Palma Mill, Bumi Sentosa Estate and Bumi Lestari Estate. Complaint in 2017 only exists in the Bumi Palma estate from Bagan Jaya village on October,25 2017. The company has followed up the complaints on October 30, 2017. Based on interview with workers, all complaint has been responded by the company. The estate and mill managers are appointed as a social officer, assisted by SPO officers and CSR officers of the region.

Status: Comply

6.4

Any negotiations concerning compensation for loss of legal or customary rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

6.4.1; 6.4.2;

Procedure of land dispute or conflict resolution was presented in document No. SOP/SMART/SENS-CSR/SADV/II/002 dated July 1st 2014. And No. SOP/SMART/SENS-CSR/SADV/II/003 dated July 1st 2014. Moreover, procedure on compensation was presented in document No. SOP/NP/SMART/VII/D&L002 dated July 10th 2010. Procedure mentioned that resolution has adopt FPIC process, involving occupant, village and/or government representative (chief and elders). These procedures were still valid. Up to ASA-4, it was known that there is no extension or new expansion of estate operational areas.

According to the previous assessment, it was reported that land dispute were settled up since 2006. However, it was reported by estate management that there were identified new disputes areas totaling for about 23.28 ha, which claimed by 8 persons from surrounding Villages. Map of dispute areas was available. To overcome this situation, estate management, occupant and stakeholder from village representative (Chief of Village and Elders) has agreed a resolution which mentioned that there will be

no conflict between affected parties. All agreement were signed in January 2018 and this matters has goes smoothly without any conflicts. Compensation of dispute areas will be paid when occupant proposed to handed over their land to the estate management.

Status: Comply

6.5

Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

6.5.1 Major

Company has implemented the payment of wages for employees refers to the minimum wage in accordance with Decree of Riau Governor No. 120/I/2017 dated 21 January 2017 is explained Minimum Wage is set at IDR. 2,516,812. Based on document verification of Salary Slip January 2018 was known that wages payment is in accordance with the Minimum Wages 2017. Terms of overtime payments are also in accordance to National Regulation with the provision of overtime calculation ie 1.5 hourly wages for first hour overtime and 2 x one hour wage for second hour overtime. Based on interviews with Labor Union, Labour Agency and workers, explained that the Company has paid wages according to the minimum wage set by the government and there is no issue about payment or worker welfare.

Terms of overtime payments for employees who work over working hours have been made in accordance with applicable provisions, such as examples of overtime workers of office workers and mill. For harvesters do not use overtime payment system, but the system of premium payment of harvest by still get the basic wage and there is no violation of wage or forced labor regulation.

6.5.2 Major

Employment law contained in the Collective Labour Agreement period 2015 – 2017 which contained in Bahasa. The document has been contained about the acceptance of workers, working time, wages, employment, overtime and the payment, social security, work equipment and OHS, old age insurance and etc. Based on the results of interviews with labor union, Colective Labor Agreement still in the discussion phase, so the previous Colective Labor Agreement still valid until the next 1 year. Interview results with Labor union and management, Collective Labour Agreement has been explained by labor union and management to the workers.

Based on interviews with workers, Labor Union and Labor Agency known that all employees have employment agreements or appointment letter and there were no issues or violations committed by Company related to worker welfare included in payment. Information of employment status to workers and the adjustment record in payroll. **OFI**

6.5.3 Minor & 6.5.4 Minor

Based on visit to the housing complex, company has been providing workers as well as homes, worship places, clinic, schools (kindergarten, primary and junior high school), sports facilities and also daycare in appropriate conditions. In addition, the company provides transportation for student who attend school in the village around the company. Electricity in housing complex have been provided from mill and the clean water supply provided by the company through the artesian well. Based on interviews with workers and labor union, explained that the number of homes provided by the company have been sufficient for all workers. The workers also equipped by the worker’s cooperative that sell basic necessities and have easy access to surrounding villages to get basic necessities.

Status: Comply

6.6

The employer respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

6.6.1 Major

Company has Policy of Freedom of Association for Employees which contained in Circular letter No.045/CEO5-SE/11/2010 dated 16 November 2010 and contained in Bahasa. It stated that the company respects the provisions and rules applicable in Law 21 of 2000 including freedom of association for workers / employees that are the basic rights of workers.

Implementation of the policy is formation of Labor Union. Labor Union agreements and/or labor laws that explain payments and working conditions listed in the document Collective Labour Agreement which was signed by representatives of

employer and workers and has been approved by the Labour Agency of Indragiri Hilir District. From interviews with employees and labor union officials, it was known that every worker has the right to join the labor union. In addition, union membership is voluntary for the workers.

6.6.2 Minor

Company showed minutes of meeting of Labor Union, for example on March, 29 2016 discussed about management of Labor Union attended by 22 participants. Based on interviews with labor union, explained that Labor Union has good communication with the company and for the minutes of the meeting also owned by Labor Union.

Status: Comply

6.7

Children are not employed or exploited.

6.7.1 Major

Policy related to requirement of worker age can be traced through the Circular Letter from HR Director No. 002/SE-HRDV/03/09 dated 31 March 2009. The policy explained that the minimum age of workers who accepted is 18 years. Based on Employee List 2017 which described the worker's date of birth, it was known that age of all workers over 18 years. As well as the visit and interviews with labor union, not found any worker who is under 18 years. Workers have been aware that the minimum age for employment is 18 years old and at the time of acceptance of work must be equipped with an ID card.

Status: Comply

6.8

Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.

6.8.1 Major & 6.8.2 Major

Policy related to not discriminate the workers listed in the Non Discrimination accordance with Circular Letter CEO PSM 5 No. 003/CEO5-SE/06/2009 dated 24 June 2009 stated that every operational unit must realize industrial relations without distinction of race, religion, race and sex in all occupations.

Based on the list of workers, it was known that workers come from diverse ethnic, religious, age, sex and there was no migrant workers. Based on interview with Labor Union, gender committee and workers at field observation known that the company did not discriminate against workers on the work reception or promotions.

6.8.3 Minor

Company can show identity of workers recorded when applying, such as ID card, Education Certificate, family card, results of medical check up, etc. Company can demonstrated promotion or appointment of new employees based on assessment. Based on interviews with Labor Union, workers and gender committee, known that he company did not discriminate the workers from acceptance till promotions.

Status: Comply

6.9

There is no harassment or abuse in the work place, and reproductive rights are protected.

6.9.1 Major; 6.9.2 Major

Policy regarding sexual harassment is listed in Circular Letter CEO 5 No. 001/CEO5-SE/02/2009 dated 20 february 2009. The Company has formed a Gender Committee to address women-related issues. Based on interviews with woman workers, the workers have known board of the Gender Committee. The results of interviews with female workers, gender committee members and housing residents revealed that there were no cases or complaints related to harassment or violence against women in the past year.

Policy related to reproductive rights for female workers is listed in the document, such as:

- Circular Letter CEO 5 No. 002/CEO 5-SE/03/2009 dated 2 March 2009.
- Memorandum VPA PSM 5 No. 001/SE/VPA5/12/08 dated 20 December 2008
- Collective Labor Agreement.

Based on interviews with a Gender Committee and female workers that workers can explain the reproductive rights that given by the company include leave of menstruation are given 2 days with the information from paramedic and day off for childbirth are given for period 1.5 months before giving birth and 1.5 months after giving birth. They also given the opportunity to breastfeed and not work in contact with chemicals.

6.9.3 Minor

The company has SOP No. SOP/SMART/SIGS-CSR/SADV/II/003 about Handling Complaints and Dissatisfaction. Completion of grievances or dissatisfaction within the Grievance Mechanism consists of several settlement steps. Started from the Chief of Administration who is tasked to receive reports of complaints and dissatisfaction, and continued with the completion by Head unit level, RC/PC, and VPA/VPM/CEO. In the SOP also explained about the protection of whistleblower. Grievances can also be communicated through labor union in the company. The procedure has been socialized to stakeholders. It shown in the socialization monitoring document for example documentation of socialization on August 2, 2017 attended by 53 participants and from interviews with stakeholders such as representatives of Bagan Jaya Village, Pengalihan Village, etc.

Complaint related to woman issues can be submitted through Gender Committee. The company has appointed gender committee members as a forum to address women's issues.

Based on interviews with female workers, the workers can explaining the mechanism of reporting sexual harassment is reported to the members of gender committee. Based on interview with gender committee, explained that any complaint regarding sexual harassment is reported through the Gender Committee and decided together with the head of Management Unit. Based on interview with Gender Committee and workes, there are no complaints issues related to sexual harassment and violence.

Status: Comply

6.10

Growers and mills deal fairly and transparently with smallholders and other local businesses.

6.10.1; 6.10.2; 6.10.3 and 6.10.4

Company did not purchase FFB from the third party, but company has a agreement with the third party for processing FFB.FFB received by the Bumi Palma mill comes from the own estate and third party (PT Agrotunggal Jayamandiri and PT Kharisma Riau Prima Sentosa).

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1 Minor & 6.11.2 Minor

The Company has local development programs or improved quality of life and the useful environment contained in CSR Activity Plan document 2018. Implementation of CSR in accordance with the needs of the community as indicated by the document submission / proposal request assistance.

Some assistance that has been realized such as:

- assistance for the water tower.
- assistance for Fire equipment
- Assistance to improve the agricultural and fishery economy
- Assistance for Madrasah school improvement
- Etc.

In addition, the company also works with local contractors for several activities including purchases from local businesses. The results of interviews with the surrounding community was known that the company has realized the assistance to the surrounding village. Based on the results of document review, stakeholder interviews and field visits also known there is no scheme smallholders.

	Status: Comply	
6.12		
No forms of forced or trafficked labour are used.		
6.12.1 Major, 6.12.2 Minor & 6.12.3 Major		
Based on employment documents verification, field observation, interview with Labor Union and Labour Agency, it was known that workers are permanent worker, and contract workers. There are no migrant workers, no substitution contracts, no labor trade or forced labor forms were found. All workers has been equipped with the Working Agreement or Appointment Letter that has been agreed together.		
Based on the results of field visit in estates and mill such as harvesting activitiy, spraying activity were not found child labor or worker families who helped worker without any agreement.		
	Status: Comply	
6.13		
Growers and millers respect human rights		
6.13.1 Major		
The Policy of human right is written in point 6 of social and community which is approved by the President director at November 10 2011. The company has socialized the policy which is showed by evidence :		
<ul style="list-style-type: none"> - Socialization on November – October 2017 attended by 45 participants, - Socialization on March, 7 2017 attended by 14 participants from contractor workers. 		
Based on interviews with workers, Labor Unions and Labour Agency, there was no issues regarding human right violation issues, the worker welfare, no discrimination against workers and company has given of right in accordance with the agreement.		
	Status: Comply	
PRINCIPLE #7 Responsible development of new plantings		
7.1		
A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.		
7.1.1; 7.1.2; 7.1.3		
Certification units have no expansion and new development of plantation area after November 2005.		
	Status: Comply	
7.2		
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.		
Based on interview with estate management unit, government agencies, village representatives, as well as review on hectare statement 2018, it could be concluded that there is no new expansion or extension of PT BPLP operational areas. Land clearing has lastly carried out in October 2005.		
HCV assessment has conducted in 2012. Golden Agri Resources (GAR) as mother company of PT BPLP has deliver disclosure of liability data and zero liability through email on August 29 th 2014.		
	Status: Comply	
7.3		
New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.		
7.3.1, 7.3.2, 7.3.3, 7.3.4, 7.3.5		
PT BPLP does not make any expansion over its operation area after November 2005. Document's review and interview with management revealed that the latest land clearing was conducted in October 2005.		
The document review and interview with management showed that the company is not performed land		

clearing after 1 November 2005. HCV identification in PT BPLP was conducted on 2012. GAR, as the parent of PT BPLP has conducted disclosure of liability data and zero liability disclosure on 29 August 2014 by email	
Status: Comply	
7.4	
Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.	
Based on interview with estate management unit, government agencies, village representatives, as well as review on hectare statement 2018, it could be concluded that there is no new expansion or extension of PT BPLP operational areas. Land clearing has lastly carried out in October 2005.	
HCV assessment has conducted in 2012. Golden Agri Resources (GAR) as mother company of PT BPLP has deliver disclosure of liability data and zero liability through email on August 29 th 2014.	
Status: Comply	
7.5	
No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	
7.5.1	
Based on interview with estate management unit, government agencies, village representatives, as well as review on hectare statement 2018, it could be concluded that there is no new expansion or extension of PT BPLP operational areas. Land clearing has lastly carried out in October 2005.	
HCV assessment has conducted in 2012. Golden Agri Resources (GAR) as mother company of PT BPLP has deliver disclosure of liability data and zero liability through email on August 29 th 2014.	
Status: Comply	
7.6	
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.	
7.6.1; 7.6.1; 7.6.3; 7.6.4; 7.6.5 and 7.6.6	
Based on interview with estate management unit, government agencies, village representatives, as well as review on hectare statement 2018, it could be concluded that there is no new expansion or extension of PT BPLP operational areas. Land clearing has lastly carried out in October 2005.	
HCV assessment has conducted in 2012. Golden Agri Resources (GAR) as mother company of PT BPLP has deliver disclosure of liability data and zero liability through email on August 29 th 2014.	
Status: Comply	
7.7	
Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.	
Based on interview with estate management unit, government agencies, village representatives, as well as review on hectare statement 2018, it could be concluded that there is no new expansion or extension of PT BPLP operational areas. Land clearing has lastly carried out in October 2005.	
HCV assessment has conducted in 2012. Golden Agri Resources (GAR) as mother company of PT BPLP has deliver disclosure of liability data and zero liability through email on August 29 th 2014.	
Status: Comply	
7.8	
New plantation developments are designed to minimise net greenhouse gas emissions.	
Based on interview with estate management unit, government agencies, village representatives, as well as review on hectare statement 2018, it could be concluded that there is no new expansion or extension of PT BPLP operational areas. Land clearing has lastly carried out in October 2005.	

HCV assessment has conducted in 2012. Golden Agri Resources (GAR) as mother company of PT BPLP has deliver disclosure of liability data and zero liability through email on August 29th 2014.

Status: Comply

PRINCIPLE #8 Commitment to continuous improvement in key areas of activity

8.1

Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

8.1.1

The Company has a commitment to eliminate use of paraquat through memorandum No.032 / PD / VIII / 2016 dated 13 August 2015 from the President Director. Base on Audit ASA-4 The Company is committed in the preparation of the 2018 budget already eliminated the use of paraquat.

In terms of continuous improvement in the social field, the company has developed social management and monitoring plans developed by involving the participation of affected parties. These plans have also been developed in accordance with the issues or problems caused by operational of the company. Social management and monitoring plan has contained some negative impacts in accordance with the results of public consultations with surrounding villagers.

During ASA-4, team auditor has noted a fact, with chronology as follows:

- Based on internal audit of PT BPLP which conducted in October 10th-13th 2017, it was informed there were unsynchronized data position of public cemetery area. Previously this are managed by CH.
- Estate management asked the respective Divisions to conduct study on areal statement and legal boundary review, as response of internal audit finding.
- Coordination with stakeholder has produce compilation of spatial data's towards area statement, land permit (HGU and Location Permit) and resulting desktop study report.
- Desktop study report informed that public cemetery was located inside Block H-10 BPME. This Block has also identified situated inside Location Permit area but outside of Land Title (HGU) area. Currently, status of cemetery was HCV-6 and 1998 planted palms in this Block were still exist.
- Unit management and respective Departments has managed to review and compile new areal statement of PT BPLP (BPME, BPME and BSNE).
- As results, estate management has divided RSPO certified and non-certified areas. This matters has starts implemented in January 1st 2018. Detail of non-certified areas is presented as follows:

Remarks	Area (ha)
Mature palms (planted in 1998)	30.77
Mill employees housing complex	5.71
Road	1.17
Swamp, canal, river	1.03
Public cemetery (HCV)	0.53
Total	39.21

- Those chronology were issued by Regional Controller Perkebunan Sinar Mas (PSM)-5.

Regarding the facts mentioned above, follow up and several action has already taken by CH management, describes as follows:

- Regional Controller of Indragiri Hilir Region Letter dated October 19th 2019 which mentioned an instruction for BPME Manager to stop and terminate replanting and upkeep activities (includes agrochemicals application).
- To avoid social negative impact, harvesting were still conducted with rotation twice a month, as instructed on Manager Circulation Letter No. 001/RC/Indragiri/01/2018. FFB harvested were record separately. For example, record on January 30th 2018 and February 12th 2018 informed that FFB production from Block H-10 were 28 and 232 kg/ha, respectively.
- CH management has proposed a Building Use Right (HGB) to National land Agency (BPN) of Indragiri Hilir Regency for about 5.71 ha which shows through Letter of Director No. 01.ist/D&L-pku/II/2018 dated January 11th 2018 and Land Title or land use right (HGU) for about 33.50 ha, which shows through Letter No. 062/D&L-Pku/II/2018 dated

February 22nd 2018. Both Letter were accepted by BPN on January 15th 2018 and January 28th 2018, respectively.

- Declaration Letter of Director No. 014/RC/Indragiri/10/2017 dated February 12th 2018, which stated that the non-HGU areas (39.21 ha) will be separated as declared as RSPO non-certified area. However, RSPO certified areas were still 6,690 ha.

Hence, based on explanation above, certificate holder has encourage to monitor and follow up the ongoing land right acquisition process. This matter will be observed on the next audit assessment. **OFI**.

Status: OFI

3.2. Summary of Assessment Report of Supply Chain Requirement

3.2.1 General chain of custody requirements for the supply chain

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.
	Question: Does the organization take legal ownership and physically handles RSPO Certified Sustainable oil palm products at their premises or through the outsourcers?
	FFB processing is fully conducted by BPMM, includes buying and selling of its certified products. However, transportation was conducted by PT Ivomas Tunggal as buyer.
	Status: Comply
5.1.2	Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.
	Question: Is the organization buying from RSPO licensed traders who pass the certification number of the product manufacturer and the applicable supply chain model?
	BPMM do not buys RSPO products from another licensed traders.
	Status: Comply
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.
	Question: Is the site level or its parent company a member of RSPO and registered on RSPO IT platform?
	RSPO IT Platform member registration number: RSPO_PO1000001064.
	Status: Comply
5.1.4	Processing aids do not need to be included within an organization's scope of certification.
	Question: Is the site level or its parent had a processing aids?
	There is no processing aids in BPMM.
	Status: Comply
5.2	Supply chain model
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.
	Question: Has the organization applied the Supply Chain Model correctly?
	BPMM has implementing mass balance supply chain model. Hence, volume of certified products has used mass balance claim. Bellows are FFB supplier for BPMM:
	<ul style="list-style-type: none"> • PT Bumipalma LestariPersada (RSPO certified). • PT Meganusa Intisawit (RSPO certified). • PT Kharisma Riau Sentosa (RSPO non-certified). • PT Agro Tunggal Jaya (RSPO non-certified)

<p>BPMM has shows records of CPO and PK being produced which separated into RSPO certified and non-certified products. Only RSPO certified product could be sold as mass balance.</p>	
	<p>Status: Comply</p>
<p>5.2.2 The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p>	
<p>Question: Has the organization applied a combination of Supply Chain Model correctly?</p>	
<p>BPMMhas only apply mass balance supply chain model (Module E).</p>	
	<p>Status: Comply</p>
5.3	<p>Documented procedures</p>
<p>5.3.1 The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.</p>	
<p>Questions : Documented procedures established and covering all provisions following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. 	
<p>Procedure of mass balance system of CH is presented in document No. SOP/SMART/CERS-EHSD/SADV/II/003 dated July 1st 2014 procedure has covers identification and traceability of RSPO certified and non-certified products, as well as responsible person in charge.</p> <p>CH management unit and operators of weigh-bridge mentioned that training and refreshment (awareness) of supply chain management system were carried out annually. In 2017, the respective training has conducted on October 5th 2017 in BPMM Meeting Room, attended by 18 participant. Furthermore, based on interview and observation to two weigh-bridge stations, it was known that bridge with certified FFB from PT BPLP owned estate were received and measured in weigh-bridge with capacity 20 ton, while FFB from outsider and “long-strip” areas (which was certified areas of PT BPLP) were received in weigh-bridge with capacity 40 ton. Software program of “Weighbridge” has used by operator to classified and separate RSPO certified and non-certified products.</p>	
	<p>Status: Comply</p>
<p>5.3.2 The site shall have a written procedure to conduct annual internal audit</p>	
<p>Question :</p> <p>Documented annual internal audit procedures established and covering all provisions :</p> <p>i) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>ii) Effectively implements and maintains the standard requirements within its organization.</p>	
<p>Procedure of internal audit is presented in document Form No. F/SMART/UMUM/SADV/002/002. Internal audit has conducted annually. Every findings were discussed into management review meeting. Corrective action is taken if necessary. Based on internal audit report October 2017 review, it was informed that there is no findings or no non-conformity identified related to supply chain management system.</p>	
	<p>Status: Comply</p>
5.4	<p>Purchasing and goods in</p>
<p>5.4.1 The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier</p>	
<p>Question :</p> <p>All RSPO product information is provided by suppliers in accordance with :</p> <ul style="list-style-type: none"> • The name and address of the buyer; 	

- The name and address of the seller;
- The loading or shipment / delivery date;
- The date on which the documents were issued;
- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);
- The quantity of the products delivered;
- Any related transport documentation;
- Supply Chain certificate number of the seller;
- A unique identification number
- Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).
- The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.
- A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.
- The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements/announcements.

BPMM has received FFB RSPO certified from PT Meganusa Intisawit (PT MNIS), which was in the same group of Golden Agri Resources (GAR). BPMM do not bought RSPO certified products (CSPO and CSPK) from outsource or traders. Certified product of BPMM were sold to PT Ivomas Tunggal. All data such as name, address, date of transaction, date of issued claim, transport documentation were match without any non compliance.

Status: Comply

5.4.2

The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents

Question :

Has the organization established mechanism in place for handling non-conforming oil palm products and/or documents?

Mechanism of handling of RSPO certified and non-certified products is presented in document No. SOP/SMART/CERS-EHSD/SADV/003 dated July 1st 2014 procedure has covers identification and traceability of RSPO certified and non-certified products, as well as responsible person in charge.

Based on interview and observation to two weigh-bridge stations, it was known that bridge with certified FFB from PT BPLP owned estate were received and measured in weigh-bridge with capacity 20 ton, while FFB from outsider and "long-strip" areas (which was certified areas of PT BPLP) were received in weigh-bridge with capacity 40 ton. Software program of "Weighbridge" has used by operator to classified and separate RSPO certified and non-certified products

Status: Comply

5.5

Outsourcing activities

5.5.1

In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.

Question : Are the outsourcers RSPO certified?

There is no outsources for storage, transport or other outsourced activities, and there is no refining or crushing activities conducted by BPMM.

Status: Comply

5.5.2

Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:

<p>a. The site has legal ownership of all input material to be included in outsourced processes;</p> <p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance</p>	
<p>Question : Has the site established outsourcing procedures, agreement and keeps legal ownership of the products during the outsourcing</p>	
<p>There is no outsources for storage, transport or other outsourced activities, and there is no refining or crushing activities conducted by BPMM.</p>	
	<p>Status: Comply</p>
<p>5.5.3 The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p>	
<p>Question : Has the site maintained names and contact details of all outsourcers?</p>	
<p>There is no outsources for storage, transport or other outsourced activities, and there is no refining or crushing activities conducted by BPMM.</p>	
	<p>Status: Comply</p>
<p>5.5.4 The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products</p>	
<p>Question : Has MUTU informed about any new outsourcers?</p>	
<p>There is no outsources for storage, transport or other outsourced activities, and there is no refining or crushing activities conducted by BPMM.</p>	
	<p>Status: Comply</p>
5.6	Sales and goods out
<p>5.6.1 The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer</p>	
<p>Question :</p> <p>All RSPO product information is provided by the organisation in accordance with :</p> <ul style="list-style-type: none"> • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products • For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. • 	
<p>RSPO certified products from BPMM were sold to PT Ivomas Tunggal. Supporting document such as contract agreement, delivery order, delivery ticket, volume of product delivered, etc. which informed RSPO mass balance supply chain products</p>	

were available on site.

Status: Comply

5.7 Registration of transactions

5.7.1

Supply chain actors who:

- are mills, traders, crushers and refineries; and
- take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable

Question :

Has the organization registered their transactions in the RSPO IT platform? (mills, traders, crushers and refineries only)

RSPO IT Platform member registration number: RSPO_PO1000001064.

All transaction of RSPO certified oil palm products has been registered in RSPO IT Platform (see indicator SCCS 5.7.2).

Status: Comply

5.7.2

The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:

- Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.
- Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.
- Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.
- Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.

Question :

Did the organization correctly perform the applicable actions on RSPO IT Platform?

BPMM shows RSPO IT Platform implementation, which presented as follows:

Certified CPO sold to each buyer period of March 25th 2017 to February 19th 2018

Date	Delivery Order No.	Volume (mt)
09 Aug 2017	2250/CPO/2250/17/T016	550.44
29 Aug 2017	2250/CPO/2250/17/T017	1,004.91
16 Sep 2017	2250/CPO/2250/17/T018	950.07
11 Oct 2017	2250/CPO/2250/17/T019	1,049.66
26 Oct 2017	2250/CPO/2250/17/T020	806.68
10 Nov 2017	2250/CPO/2250/17/T021	600.24
25 Nov 2017	2250/CPO/2250/17/T022	702.41
12 Jan 2018	2250/CPO/2250/17/T026	897.44
29 Jan 2018	2250/CPO/2250/18/T001	895.90
31 Jan 2018	2250/CPO/2250/18/T002	50.81
Total		8,068.56

According to the Table above, it could be concluded that total RSPO CSPO delivered from BPMM was 8,068.56 mt. This figure was 11.77 mt or 0.15 % lower from the figure declare by buyer (PT Ivomas Tunggal) in palm-trace, which was about 8,080.33 mt. However, the difference was still below tolerance (5 %).

Certified Palm Kernel sold to each buyer period of March 25th 2017 to February 19th 2018

Date	Delivery Order No.	Volume (mt)	Remarks
01-18 Feb 2017	2250/KER/2250/17/C002*	284.71	Declare in April 5 th 2017
20 Feb – 8 Mar 2017	2250/KER/2250/17/C003*	202.82	Declare in April 5 th 2017
17-24 Mar 2017	2250/KER/2250/17/C004*	200.12	Declare in April 5 th 2017
29/11/16 – 01/022017	2350/KER/2350/17/C017*	227.34	Declare in May 16 th 2017
27 Mar 2017	2250/KER/2250/17/C002	19.67	-
27 Mar 2017	2250/KER/2250/17/C004	50.53	-
30 Mar 2017	2350/KER/2350/17/C017	72.26	-
05 Apr 2017	2250/KER/2250/17/C005	100.90	-
08 Apr 2017	2350/KER/2250/17/C005	254.90	-
25 Apr 2017	2250/KER/2250/17/C006	201.10	-
10 May 2017	2250/KER/2250/17/C007	151.37	-
31 May 2017	2250/KER/2250/17C008	200.90	-
15 Jun 2017	2250/KER/2250/17/C009	198.55	-
18 Jul 2017	2250/KER/2250/17/C010	297.83	-
10 Aug 2017	2250/KER/2250/17/C011	199.75	-
22 Aug 2017	2250/KER/2250/17/C012	199.96	-
09 Sep 2017	2250/KER/2250/17/C013	202.35	-
23 Sep 2017	2250/KER/2250/17/C014	147.72	-
04 Oct 2017	2250/KER/2250/17/C015	198.18	-
18 Oct 2017	2250/KER/2250/17C016	144.06	-
02 Nov 2017	2250/KER/2250/17/C017	198.57	-
14 Nov 2017	2250/KER/2250/17/C018	145.59	-
02 Dec 2017	2250/KER/2250/17/C019	201.35	-
23 Dec 2017	2250/KER/2250/17/C020	195.53	-
10 Jan 2018	2250/KER/2250/17/C021	202.49	-
22 Jan 2018	2250/KER/2250/18/C001	199.82	-
31 Jan 2018	2250/KER/2250/18/C002	147.83	-
Total		4,846.20	-

According to the Table above, it could be concluded that total RSPO CSPK delivered from BPMM was 4,846.20 mt. This figure was 149.78 mt or 2.99 % lower from the figure declare by buyer (PT Ivomas Tunggal) in palm-trace, which was about 4,995.98 mt. However, the difference was still below tolerance (5 %).

Status: Comply

5.8 Training

5.8.1

The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff

Question :

Has the organization established RSPO training plan?

CH management unit and operators of weigh-bridge mentioned that training and refreshment of supply chain management system were carried out annually. In 2017, the respective training has conducted on October 5th 2017 in BPMM Meeting Room, attended by 18 participant.

Status: Comply

5.8.2

Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed

Question :

Has the organization Delivered Effective RSPO training?

CH management unit and operators of weigh-bridge mentioned that training and refreshment of supply chain management system

were carried out annually. In 2017, the respective training has conducted on October 5th 2017 in BPMM Meeting Room, attended by 18 participant.

Based on interview and observation to two weigh-bridge stations, it was known that bridge with certified FFB from PT BPLP owned estate were received and measured in weigh-bridge with capacity 20 ton, while FFB from outsider and “long-strip” areas (which was certified areas of PT BPLP) were received in weigh-bridge with capacity 40 ton. Software program of “Weighbridge” has used by operator to classified and separate RSPO certified and non-certified products.

Status: Comply

5.9 Record keeping

5.9.1

The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements

Question :

All records are accurate, complete, up-to-date and accessible?

BPMM management has provide an update of monthly summary of RSPO FFB certified and non-certified from its supply base and external sources, with recapitulation presented as follows:

Certified and non-certified FFB received period of March 25th 2017 to February 19th 2018

Month	FFB (mt)		
	RSPO Certified	Non-Certified	Total
March 25 th -31 st 2017	2,418.91	802.82	3,221.73
April 2017	9,929.22	3,056.98	12,986.20
May 2017	6,028.28	3,561.50	9,589.78
June 2017	5,366.46	3,565.98	8,932.44
July 2017	6,868.16	4,512.87	11,381.03
August 2017	7,126.55	4,889.76	12,016.31
September 2017	6,299.29	2,861.07	9,160.36
October 2017	6,267.47	3,935.88	10,203.35
November 2017	6,648.14	4,301.09	10,949.23
December 2017	6,808.60	5,770.56	12,579.16
January 2018	6,765.30	5,096.31	11,861.61
February 1 st -19 th 2018	4,048.73	3,044.49	7,093.22
Total	74,575.14	45,399.31	119,974.45

According to the Table above, it could be concluded that company management has satisfactory records FFB production and separated it into RSPO Certified and Non-Certified.

Furthermore, BPMM has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as its dispatch on a monthly and three monthly basis, presented in the Table bellows:

Crude Palm Oil Production and Dispatch of BPMM

Period	CPO Production (mt)			CPO Dispatch (mt)			
	Cert	Non-Cert	Total	RSPO	ISCC	Non-Cert	Total
2016*	278.75	271.02	549.77	-	-	-	-
Jan-17	1,756.29	696.60	2,452.89	-	1,479.79	397.78	1,877.57
Feb-17	1,388.48	950.59	2,339.07	-	1,525.98	1,055.12	2,581.10
Mar-17	1,882.24	857.47	2,739.71	-	1,599.95	1,050.61	2,650.56
Total	5,027.01	2,504.66	7,531.67	-	4,605.72	2,503.51	7,109.23
Apr-17	2,172.20	575.65	2,747.85	-	1,298.71	1,300.26	2,598.97
May 17	1,343.71	647.42	1,991.14	-	1,479.00	1,143.99	2,622.99

Jun-17	1,213.97	636.57	1,850.54	-	1,067.57	533.13	1,600.70
Total	4,729.88	1,859.64	6,589.52		3,845.28	2,977.38	6,822.66
Jul-17	1,545.57	812.46	2,358.03	-	1,685.35	1,104.23	2,789.58
Aug 17	1,661.47	916.55	2,578.02	1,555.35	13.01	677.46	2,245.82
Sep-17	1,446.98	564.79	2,011.77	1,432.92	-	598.67	2,031.59
Total	4,654.01	2,293.80	6,947.81	2,988.27	1,698.36	2,380.36	7,066.99
Oct 17	1,456.97	758.74	2,215.71	1,373.49	-	768.46	2,141.95
Nov 17	1,438.53	925.86	2,364.39	1,302.65	-	881.53	2,184.18
Dec 17	1,462.81	1,236.20	2,699.01	1,561.95	-	976.09	2,538.04
Total	4,358.32	2,920.80	7,279.12	4,238.09	-	2,626.08	6,864.17

Note: stock from 2016

Palm Kernel Production and Dispatch of BPMM

Period	PK Production (mt)			PK Dispatch (mt)			
	Cert	Non-Cert	Total	RSPO	ISCC	Non-Cert	Total
2016*	136.53	218.80	355.32	-	-	-	-
Jan-17	365,031	166,200	531,231	263,020	-	241,120	504,140
Feb-17	318,402	259,907	578,309	550,420	-	204,000	754,420
Mar-17	495,340	256,709	752,049	388,930	-	337,890	726,820
Total	1,178,773	682,816	1,861,589	1,202,370	-	783,010	1,985,380
Apr-17	541,433	159,087	700,520	633,240	-	134,050	767,290
May 17	314,370	173,708	488,078	275,930	-	170,180	446,110
Jun-17	280,455	173,921	454,376	198,550	-	91,340	289,890
Total	1,136,258	506,716	1,642,974	1,107,720	-	395,570	1,503,290
Jul-17	358,344	219,744	578,088	422,450	-	301,590	724,040
Aug 17	372,305	238,136	610,441	370,840	-	291,120	661,960
Sep-17	347,697	148,702	496,399	382,640	-	147,590	530,230
Total	1,078,345	606,583	1,684,928	1,175,930	-	740,300	1,916,230
Oct 17	383,169	221,986	605,155	396,830	-	185,790	582,620
Nov 17	348,935	228,499	577,434	338,460	-	277,840	616,300
Dec 17	345,526	294,980	640,506	319,890	-	264,680	584,570
Total	1,077,630	745,465	1,823,095	1,055,180	-	728,310	1,783,490

Note: stock from 2016

Based on the Table above, it could be concluded that delivery of RSPO certified product (CSPO and CSPK) has only derived from a positive stock.

Status: Comply

5.9.2

Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock

Question :

All records are kept for minimum two years and comply with legal and regulatory requirements?

Based on document review, transaction data as mentioned in Indicator 5..9.1 from 2015 to February 2018 were still save in BPMM unit.

Status: Comply

5.9.3

The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.

Question :

For all palm oil / palm kernel oil volumes purchased (input) and claimed (output) records kept over a period of twelve (12) months.?

Estimation of certified product from BPMM for 2017/2018 is presented in the Certificate Appendix and this ASA-4 report. Information of certified products quota and actual certified products sold were also could be accessed through palm-trace system. As per February 19th 2018, the quota and actual production of RSPO certified products (CSPO and CSPK) from BPMM is presented as follows:

Certified Products	Estimation Tonnage of Certified Products (Mar 25 th 2017 – Mar 24 th 2018)	Remaining Certified Products (Mar 25 th 2017 – Feb 19 th 2018)	Additional Volume (Extension)
CSPO	18,134.00 mt	10,053.67 mt	- mt
CSPK	4,121.00 mt	40.01 mt	914.99 mt

From the Table above it could be concluded that during March 25th 2017 to February 19th 2018, certified product sold for CSPO and CSPK were **8,080.33 mt** and **4,995.98 mt**, respectively. From the actual production figure, estimation of certified products for period March 25th 2018 to March 24th 2019 were **20,245 mt** and **5,240 mt** for CSPO and CSPK, respectively.

Status: Comply

5.10

Conversion factors

5.10.1

Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries

Question :

Conversion rates applied accurately?

BPMM has only performs FFB processing to produce CPO and PK. Based on SOP of Mass Balance, it is explained that the conversion factors of CPO and PK were based on actual rendemen.

Status: Comply

5.10.2

Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.

Question :

Conversion rates periodically updated?

Conversion factors of CPO and PK were based on actual rendemen. This calculation was conducted daily by laboratory of BPMM with monthly and annual recapitulation.

Status: Comply

5.11

Claims

5.11.1

The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.

Question :

Any communication to any stakeholder group / customers issued in accordance with RSPO Rules on Market Communications and Claims?

Based on announcement and transaction report documents review, it could be concluded that all CSPO and CSPK submitted were in accordance with the mass balance supply chain model.

	Status: Comply
5.12	Complaints
5.12.1 The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	
Question : Documented procedures for stakeholders complaints established?	
Procedure of receiving complaint is presented in document No. SOP/SMART/SIGS-CSR/SADV/II/003. However, based on complaint logbook review, it could be concluded that up to ASA-4, there is no complaint related to mass balance supply chain system implementation.	
	Status: Comply
5.13	Management review
5.13.1 The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken	
Question : Management reviews performed annually at planned intervals?	
Management review has conducted annually through internal audit, which the last has conducted in October 2017.	
	Status: Comply
5.13.2 The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
Question : Has all input required above has been included in the management review?	
CH shows management review which appears as response of internal audit results. Root cause analysis, corrective action and sorrection evidence to fulfill any non-conformity found during audit were available. Based on document review, it was informed that all important points identified during internal audit has fully settlep up in January 4 th 2018.	
	Status: Comply
5.13.3 The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
Question : Has all output required above has been included in the management review?	
CH shows management review which appears as response of internal audit results. Root cause analysis, corrective action and sorrection evidence to fulfill any non-conformity found during audit were available. Based on document review, it was informed that all important points identified during internal audit has fully settlep up in January 4 th 2018.	
	Status: Comply

3.2.3 (Module E) CPO Mills - Mass Balance Requirements

Clause	(Module E) CPO Mills - Mass Balance Requirements																		
E.1	Definition																		
E.1.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.																		
	<p>Bumi Palma palm Oil Mill (BPMM) of PT BPLP as certificate holder (CH) has implementing mass balance supply chain model, with certification code MUTU-RSPO/034 issued in March 25th 2014. RSPO non-certified FFB processed in BPMM were came from several out-growers, i.e. PT Agro Tunggal Jaya Mandiri and PT Kharisma Riau Sentosa Prima Details of RSPO non-certified FFB suppliers could be seen on basic info in this report.</p> <p>Based on interview and observation to two weigh-bridge stations, it was known that bridge with certified FFB from PT BPLP owned estate were received and measured in weigh-bridge with capacity 20 ton, while FFB from outsider and “long-strip” areas (which was certified areas of PT BPLP) were received in weigh-bridge with capacity 40 ton. Software program of “Weighbridge” has used by operator to classified and separate RSPO certified and non-certified products.</p>																		
	Status: Comply																		
E.2	Explanation																		
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.																		
	<p>Estimation of certified product from BPMM for 2017/2018 is presented in the Certificate Appendix and this ASA-4 report. Information of certified products quota and actual certified products sold were also could be accessed through palm-trace system. As per February 19th 2018, the quota and actual production of RSPO certified products (CSPO and CSPK) from BPMM is presented as follows:</p> <table border="1"> <thead> <tr> <th>Certified Products</th> <th>Estimation Tonnage of Certified Products (Mar 25th 2017 – Mar 24th 2018)</th> <th>Remaining Certified Products (Mar 25th 2017 – Feb 19th 2018)</th> <th>Additional Volume (Extension)</th> </tr> </thead> <tbody> <tr> <td>CSPO</td> <td>18,134.00 mt</td> <td>10,053.67 mt</td> <td>- mt</td> </tr> <tr> <td>CSPK</td> <td>4,121.00 mt</td> <td>40.01 mt</td> <td>914.99 mt</td> </tr> </tbody> </table> <p>From the Table above it could be concluded that during March 25th 2017 to February 19th 2018, certified product sold for CSPO and CSPK were 8,080.33 mt and 4,995.98 mt, respectively. From the actual production figure, estimation of certified products for period March 25th 2018 to March 24th 2019 were 20,245 mt and 5,240 mt for CSPO and CSPK, respectively.</p>	Certified Products	Estimation Tonnage of Certified Products (Mar 25 th 2017 – Mar 24 th 2018)	Remaining Certified Products (Mar 25 th 2017 – Feb 19 th 2018)	Additional Volume (Extension)	CSPO	18,134.00 mt	10,053.67 mt	- mt	CSPK	4,121.00 mt	40.01 mt	914.99 mt						
Certified Products	Estimation Tonnage of Certified Products (Mar 25 th 2017 – Mar 24 th 2018)	Remaining Certified Products (Mar 25 th 2017 – Feb 19 th 2018)	Additional Volume (Extension)																
CSPO	18,134.00 mt	10,053.67 mt	- mt																
CSPK	4,121.00 mt	40.01 mt	914.99 mt																
	Status: Comply																		
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).																		
	<p>RSPO IT Platform member registration number: RSPO_PO1000001064</p> <p>Certified CPO sold to each buyer period of March 25th 2017 to February 19th 2018</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Delivery Order No.</th> <th>Volume (mt)</th> </tr> </thead> <tbody> <tr> <td>09 Aug 2017</td> <td>2250/CPO/2250/17/T016</td> <td>550.44</td> </tr> <tr> <td>29 Aug 2017</td> <td>2250/CPO/2250/17/T017</td> <td>1,004.91</td> </tr> <tr> <td>16 Sep 2017</td> <td>2250/CPO/2250/17/T018</td> <td>950.07</td> </tr> <tr> <td>11 Oct 2017</td> <td>2250/CPO/2250/17/T019</td> <td>1,049.66</td> </tr> <tr> <td>26 Oct 2017</td> <td>2250/CPO/2250/17/T020</td> <td>806.68</td> </tr> </tbody> </table>	Date	Delivery Order No.	Volume (mt)	09 Aug 2017	2250/CPO/2250/17/T016	550.44	29 Aug 2017	2250/CPO/2250/17/T017	1,004.91	16 Sep 2017	2250/CPO/2250/17/T018	950.07	11 Oct 2017	2250/CPO/2250/17/T019	1,049.66	26 Oct 2017	2250/CPO/2250/17/T020	806.68
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26 Oct 2017	2250/CPO/2250/17/T020	806.68																	

10 Nov 2017	2250/CPO/2250/17/T021	600.24
25 Nov 2017	2250/CPO/2250/17/T022	702.41
12 Jan 2018	2250/CPO/2250/17/T026	897.44
29 Jan 2018	2250/CPO/2250/18/T001	895.90
31 Jan 2018	2250/CPO/2250/18/T002	50.81
Total		8,068.56

According to the Table above, it could be concluded that total RSPO CSPO delivered from BPMM was 8,068.56 mt. This figure was 11.77 mt or 0.15 % lower from the figure declare by buyer (PT Ivomas Tunggal) in palm-trace, which was about 8,080.33 mt. However, the difference was still below tolerance (5 %).

Certified Palm Kernel sold to each buyer period of March 25th 2017 to February 19th 2018

Date	Delivery Order No.	Volume (mt)	Remarks
01-18 Feb 2017	2250/KER/2250/17/C002*	284.71	Declare in April 5 th 2017
20 Feb – 8 Mar 2017	2250/KER/2250/17/C003*	202.82	Declare in April 5 th 2017
17-24 Mar 2017	2250/KER/2250/17/C004*	200.12	Declare in April 5 th 2017
29/11/16 – 01/022017	2350/KER/2350/17/C017*	227.34	Declare in May 16 th 2017
27 Mar 2017	2250/KER/2250/17/C002	19.67	-
27 Mar 2017	2250/KER/2250/17/C004	50.53	-
30 Mar 2017	2350/KER/2350/17/C017	72.26	-
05 Apr 2017	2250/KER/2250/17/C005	100.90	-
08 Apr 2017	2350/KER/2250/17/C005	254.90	-
25 Apr 2017	2250/KER/2250/17/C006	201.10	-
10 May 2017	2250/KER/2250/17/C007	151.37	-
31 May 2017	2250/KER/2250/17C008	200.90	-
15 Jun 2017	2250/KER/2250/17/C009	198.55	-
18 Jul 2017	2250/KER/2250/17/C010	297.83	-
10 Aug 2017	2250/KER/2250/17/C011	199.75	-
22 Aug 2017	2250/KER/2250/17/C012	199.96	-
09 Sep 2017	2250/KER/2250/17/C013	202.35	-
23 Sep 2017	2250/KER/2250/17/C014	147.72	-
04 Oct 2017	2250/KER/2250/17/C015	198.18	-
18 Oct 2017	2250/KER/2250/17C016	144.06	-
02 Nov 2017	2250/KER/2250/17/C017	198.57	-
14 Nov 2017	2250/KER/2250/17/C018	145.59	-
02 Dec 2017	2250/KER/2250/17/C019	201.35	-
23 Dec 2017	2250/KER/2250/17/C020	195.53	-
10 Jan 2018	2250/KER/2250/17/C021	202.49	-
22 Jan 2018	2250/KER/2250/18/C001	199.82	-
31 Jan 2018	2250/KER/2250/18/C002	147.83	-
Total		4,846.20	-

According to the Table above, it could be concluded that total RSPO CSPK delivered from BPMM was 4,846.20 mt. This figure was 149.78 mt or 2.99 % lower from the figure declare by buyer (PT Ivomas Tunggal) in palm-trace, which was about 4,995.98 mt. However, the difference was still below tolerance (5 %).

Status: Comply

E.3 Documented procedures

E.3.1

The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:

- a. Complete and up to date procedures covering the implementation of all the elements in these requirements;**
- b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.**

Procedure of mass balance system of CH is presented in document No. SOP/SMART/CERS-EHSD/SADV/II/003 dated July 1st 2014 procedure has covers identification and traceability of RSPO certified and non-certified products, as well as responsible person in charge.

CH management unit and operators of weigh-bridge mentioned that training and refreshment of supply chain management system were carried out annually. In 2017, the respective training has conducted on October 5th 2017 in BPMM Meeting Room, attended by 18 participant.

Based on interview and observation to two weigh-bridge stations, it was known that bridge with certified FFB from PT BPLP owned estate were received and measured in weigh-bridge with capacity 20 ton, while FFB from outsider and "long-strip" areas (which was certified areas of PT BPLP) were received in weigh-bridge with capacity 40 ton. Software program of "Weighbridge" has used by operator to classified and separate RSPO certified and non-certified products.

Status: Comply

E.3.2

The site shall have documented procedures for receiving and processing certified and non-certified FFBs.

Based on interview with weigh-bridge operators, it was explained that software program namely "Weighbridge" has used to identify FFB source in detail through "unique code" which specifically given and already registered in the program. The code has identified location of FFB sources (Block and Estate), tonnage delivery of traceable product, supplier name, date of harvesting and acceptance on the BPMM, delivery letter and delivery order code, driver name, etc. Furthermore, operators were also able to demonstrate traceability checking through "Weighbridge" program. Moreover, operators also explained that delivery letter from owned estates was signed/marked with "Eec = use of disaggregated default value (in kgCO₂eq/ton FFB)". For example FFB delivery letter (SPB) is presented as follows:

FFB RSPO Certified

- SPB or Delivery Note No. 2220/TBS/01/018/02 dated February 15th 2018; Series No. 26722; Source: BPME Divisi 1 Complex 15/R28 Block G7 and G8; Volume of Delivery 1,551 pcs of FFB and 3,690 kg of loose fruits. SPB signed by Transporter, BPMM Representative, Estate Manager, Divisi Assistant and Transportation Administration Staff. This SPB has follow up by weigh bridge officer through four Weighbridge Card No. 0173BPMMR14457-14460 dated February 15th 2018 which Informed Certificate ID of FFB supplier No. TBS BPME-18026722.
- SPB or Delivery Note No. 2221/TBS/03/018/02/3133 dated February 14th 2018; Series No. 53133; Source: BPLE Divisi 3 Complex 11/R09 Block R10; Volume of Delivery 1,543 pcs of FFB and 0.00 kg of loose fruits. SPB signed by Transporter, BPMM Representative, Estate Manager, Divisi Assistant and Transportation Administration Staff. This SPB has follow up by weigh bridge officer through six Weighbridge Card No. 0173BPMMR14403-14408 dated February 15th 2018 which Informed of Certificate ID of FFB supplier No. TBS BPLE-18023133.

FFB Non-RSPO Certified

- SPB Register No. KSBX/TBS/01/18/02/14117 dated February 15th 2018; Vehicle No. BG 8824 UN; FFB Sources from PT Agrotunggal Jayamandiri Divisi 1 with volume of delivery was 320 pcs of FFB (Estimate weight 4,000 kg). SPB signed by Supplier Representative, Driver and BPMM Representative. This SPB has follow up by weigh bridge officer through six Weighbridge Card No. 0173BPMMR26759 dated February 15th 2018. This card has no information of Certificate ID of FFB supplier, which automatically identified on "Weighbridge System" as RSPO Non-Certified product.

Status: Comply

E.4

Purchasing and goods in

E.4.1

The site shall verify and document the volumes of certified and non-certified FFBs received.

BPMM management has provide an update of monthly summary of RSPO FFB certified and non-certified from its supply base and external sources, with recapitulation presented as follows:

Certified and non-certified FFB received period of March 25th 2017 to February 19th 2018

Month	FFB (mt)		
	RSPO Certified	Non-Certified	Total
March 25 th -31 st 2017	2,418.91	802.82	3,221.73
April 2017	9,929.22	3,056.98	12,986.20
May 2017	6,028.28	3,561.50	9,589.78
June 2017	5,366.46	3,565.98	8,932.44

July 2017	6,868.16	4,512.87	11,381.03
August 2017	7,126.55	4,889.76	12,016.31
September 2017	6,299.29	2,861.07	9,160.36
October 2017	6,267.47	3,935.88	10,203.35
November 2017	6,648.14	4,301.09	10,949.23
December 2017	6,808.60	5,770.56	12,579.16
January 2018	6,765.30	5,096.31	11,861.61
February 1 st -19 th 2018	4,048.73	3,044.49	7,093.22
Total	74,575.14	45,399.31	119,974.45

According to the Table above, it could be concluded that company management has satisfactory records FFB production and separated it into RSPO Certified and Non-Certified.

Status: Comply

E.4.2

The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.

As crosschecked through palm-trace on February 19th 2018, it was informed that during March 25th 2017 to the checking date, certified products sold for CSPO and CSPK were 8,080.33 mt and 4,995.98 mt, respectively. Furthermore, it could be concluded that CSPO sold were not surpassed estimation quota of the certificate on the respective period, which was about 18,134.00 mt. However, CSPK sold were already surpassed the given quota, which was about 4,121.00 mt. regarding this matter, CH has informed certification body (CB) through Letter of Production Controller (PC) of Indraskti Region PT BPLP No. 005/PC-Indragiri/11/2017 dated November 14th 2017 which delivered via email and Letter of Department of Certification dated November 17th 2017 which delivered via email. The extension request was responded by the CB on November 17th 2017. This is conformed as per checked on palm-trace in February 19th 2018 which informed that additional extension volume of CSPK approved by RSPO in November 17th 2017 was about 914.99 mt, with extension reason there is an over production from certified products.

Status: Comply

E.5

Record keeping

E.5.1

- The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.**
- All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.**
- The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)**

BPMM has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as its dispatch on a monthly and three monthly basis, presented in the Table bellows:

Crude Palm Oil Production and Dispatch of BPMM

Period	CPO Production (mt)			CPO Dispatch (mt)			
	Cert	Non-Cert	Total	RSPO	ISCC	Non-Cert	Total
2016*	278.75	271.02	549.77	-	-	-	-
Jan-17	1,756.29	696.60	2,452.89	-	1,479.79	397.78	1,877.57
Feb-17	1,388.48	950.59	2,339.07	-	1,525.98	1,055.12	2,581.10
Mar-17	1,882.24	857.47	2,739.71	-	1,599.95	1,050.61	2,650.56
Total	5,027.01	2,504.66	7,531.67	-	4,605.72	2,503.51	7,109.23
Apr-17	2,172.20	575.65	2,747.85	-	1,298.71	1,300.26	2,598.97
May 17	1,343.71	647.42	1,991.14	-	1,479.00	1,143.99	2,622.99
Jun-17	1,213.97	636.57	1,850.54	-	1,067.57	533.13	1,600.70
Total	4,729.88	1,859.64	6,589.52	-	3,845.28	2,977.38	6,822.66
Jul-17	1,545.57	812.46	2,358.03	-	1,685.35	1,104.23	2,789.58

Aug 17	1,661.47	916.55	2,578.02	1,555.35	13.01	677.46	2,245.82
Sep-17	1,446.98	564.79	2,011.77	1,432.92	-	598.67	2,031.59
Total	4,654.01	2,293.80	6,947.81	2,988.27	1,698.36	2,380.36	7,066.99
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Jul-17	358,344	219,744	578,088	422,450	-	301,590	724,040
Aug 17	372,305	238,136	610,441	370,840	-	291,120	661,960
Sep-17	347,697	148,702	496,399	382,640	-	147,590	530,230
Total	1,078,345	606,583	1,684,928	1,175,930	-	740,300	1,916,230
Oct 17	383,169	221,986	605,155	396,830	-	185,790	582,620
Nov 17	348,935	228,499	577,434	338,460	-	277,840	616,300
Dec 17	345,526	294,980	640,506	319,890	-	264,680	584,570
Total	1,077,630	745,465	1,823,095	1,055,180	-	728,310	1,783,490

Note: stock from 2016

Based on the Table above, it could be concluded that delivery of RSPO certified product (CSPO and CSPK) has only derived from a positive stock.

Status: Comply

E.5.2

In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.

BPMM does not perform activities related to palm kernel crushing nor delivering it to the independent kernel crushing plant (KCP).

Status: Comply

3.3. Conformity Checklist of Certificate and Logo Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or√
ASA-4	The company does not use RSPO logo.	√
	Status: NA	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-4	The company does not use RSPO logo.	√
	Status: NA	
3.	Implementation of Certificate and Logo is not used on product	X or√
ASA-4	The company does not use RSPO logo.	√
	Status: NA	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
ASA-4	The company does not use RSPO logo.	√
	Status: NA	

3.4. Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Golden Agri Resources, Ltd against the rules for partial certification was determined through Self Assessment in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below

Golden Agri Resources, Ltd Time Bound Plan (TBP) is explained in table 1.10. Golden Agri Resources run forty two (42) mills and one hundred thirty six (136) estates (own and smallholders) in Indonesia and has achieved RSPO certified for twenty eight (28) mills and supply base in Indonesia. Golden Agri Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri Resources, Ltd on January 31, 2016 approved by President Director and MO Sustainability Strategic & Stakeholders Engagement.

MUTU has verified partial certification for un-certified unit's subsidiary of Golden Agri Resources, Ltd based on their Time Bound Plan. There are sixteen (16) uncertified management unit of GAR. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared above
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit:</p> <ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Sungai Kupang Mill and supply base), 24 – 28 October 2016 - PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), 24 – 28 October 2016 - PT Agrolestari Mandiri (Pekawai Mill and supply base), 21 – 25 November 2016 - PT Binasawit Abadi Pratama (Perdana Mill and supply base), 19 – 23 Desember 2016 - PT Agrokarya Prima Lestari (Kuayan Mill and supply base), monitoring via SPO Scorecard online. - PT Mitra Karya Agroindo (Tangar Mill and supply base), monitoring via SPO Scorecard online. - PT Paramitra Internusa Pratama (Belian Mill and supply base), 28 Maret – 01 April 2016

		<ul style="list-style-type: none"> - PT Sawit Mas Sejahtera (Sungai Kikim and supply base), monitoring via SPO Scorecard online. - PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) 28 Maret – 01 April 2016 - PT Agro Lestari Sentosa (Jalemo Mill and supply base), monitoring via SPO Scorecard online - PT Adi Tunggal Mahajaya (Sako Mill) (under construction) - PT Kresna Duta Agroindo (Pelakar Mill and supply base) 24 – 29 October 2016 - PT SMART (Bukit Kapur Mill and supply base) 15 – 19 Februari 2016 - PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) 19 – 23 Desember 2016 - PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base 06 – 10 Februari 2017 - PT Sawitakarya Manunggal (Sawita Mill and supply base)
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Company Group/Holding Statement: GAR and its subsidiaries have been reporting disclosure and zero liability to RSPO by email dated August 29, 2014 and the company has been sent data evidence of LUCA to RSPO by email dated April 11, 2016. Progress result of review LUCA at follow-up via email RSPO dated October 24, 2016 to answer RSPO is still in the review process.</p> <p>Auditor Verification: RaCP Process for:</p> <ul style="list-style-type: none"> - PT Agrolestari Mandiri (Pekawai Mill and supply base) - PT Sinar Kencana Inti Perkasa (Sungai Kupang Mill and supply base) - PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) - PT Agro Lestari Sentosa (Jalemo Mill and supply base) - PT Kresna Duta Agroindo (Pelakar Mill and supply base) - PT SMART (Bukit Kapur Mill and supply base) - PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base)
ii.	<p>Any new plantings since January 1st 2010 must comply with the RSPO New Plantings Procedure.</p>	<p>Company Group/Holding Statement: There is no new planting.</p>

		<p>Auditor Verification: Based on auditor verification there are some new planting conducted by company, but NPP has been applied these.</p> <ul style="list-style-type: none"> - PT Binasawit Abadi Pratama (Perdana Mill and supply base) - PT Agrokarya Prima Lestari (Kuayan Mill and supply base) - PT Mitra Karya Agroindo (Tangar Mill and supply base) - PT Paramitra Internusa Pratama (Belian Mill and supply base) - PT Agrolestari Mandiri (Pekawai Mill and supply base) - PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) any new planting since January 1st 2010 and NPP has been applied these.
iii.	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement: There are no land conflicts. The Company has a land conflict resolution mechanism in accordance with the RSPO criteria 6.4; 7.5; and 7.6. This procedure is outlined in the SOP Social Conflict Management (SOP/SMART/SENS-CSR/SADV/II/02). This procedure regulates social conflict settlement agreed. Conflict resolution can be done in a participatory manner and can also be done by a third party (mediator). The company also has procedures to deal with complaints before they become conflicts. The procedure is SOP/SMART/SIGS-CSR/SADV/II/003. The company handling complaints appropriately and quickly. GAR has been initiated to become a member of RSPO DSF as a category "out growers".</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no land conflicts for</p> <ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Sungai Kupang Mill and supply base) - PT Mitra Karya Agroindo (Tangar Mill and supply base) - PT Kresna Duta Agroindo (Pelakar Mill and supply base) - PT SMART (Bukit Kapur Mill and supply base) <p>There are any land conflicts but was in the process of completion for</p> <ul style="list-style-type: none"> - PT Agrolestari Mandiri (Pekawai Mill and supply base)

		<ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) - PT Sawit Mas Sejahtera (Sungai Kikim and supply base) - PT Agro Lestari Sentosa (Jalemo Mill and supply base) - PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) - PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base)
iv.	<p>Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.</p>	<p>Company Group/Holding Statement: There is no issue of labour disputes in uncertified unit. The company also has procedures to deal with complaints workers before they become conflicts. The procedure is SOP/SMART/SIGS-CSR/SADV/II/003.</p> <p>Procedures related employee issues is arranged in the form of internal grooves for employees included in the category of internal stakeholders. Media that is used to deliver complaint is a formal letter submitted by unions or incorporated into a suggestion box which is provided in a convenient location.</p> <p>Auditor Verification: There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p>
v.	<p>Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.</p>	<p>Company Group/Holding Statement: Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 and 2.2 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/II/002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p> <p>Auditor Verification: Land legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> - PT Paramitra Internusa Pratama (Belian Mill and supply base), still in the process of Committee B and the company has got plantation business permit (IUP)

		<ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), there is a legal non-compliance. - PT Agro Lestari Sentosa (Jalemo Mill and supply base) and PT Adi Tunggal Mahajaya (Sako Mill) doesn't have Land Use Title (HGU). - PT Kresna Duta Agroindo (Pelakar Mill and supply base), there is a difference the concession area between Land Use Title (HGU) and Plantation Business Permit (IUP) and Permits Location. - PT SMART (Bukit Kapur Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. - PT Sawitakarya Manunggal there is an area is still in process for HGU (Committee B meeting). - PT Djuanda Sawit Lestari is an area is still in process for HGU Muara Kandis Estate (574.58 Ha) - PT Ivomas Tunggal there is an area is still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate (419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha) - PT Buana Wiralestari Mas there is an area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha) - PT Ramajaya Pramukti there is an area is still in process for HGU Rama Rama Estate (318.76 Ha)
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3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

3.5.1 Identification of Findings, Corrective Actions and Observations at ASA-3

NCRNo.	: 2017.01	Issued by	: Mohamad Amarullah
Date Issued	: 17 Februari 2017	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 15 Februari 2018
Standard Ref. & Requirement	: 4.3.5 Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.		
Non-Conformance Description & Evidence observed : The CH was not able to shows drainability study on peat areas for long term viability of oil palm cultivation.			
Root Cause Analysis: The Company is still in the process of identifying the stages of flood-prone areas, subsidence modeling and potential impacts of floods and feasibility analysis which is a part in the different stages of assessment drainability.			
Correction: Identify flood-prone areas / less productive and cultivable areas Conducting subsidy modeling and potential flood impacts over a period of time Conducting feasibility analysis of long-term viability of oil palm plantation in peat land			
Corrective Action : Create a replanting checklist to ensure that replanting requirements are met, one of which is drainability assessment.			
Assessor Evaluation and Conclusion 15 February 2018 PT BPLP has conducted a review of drainability assessment of oil palm plantations conducted in 2018. Based on this study it is known that the drainage limit time of PT BPLP is 137.61 - 468.75 years. Based on the above explanation NCR 2017.01 has been closed			
Diverifikasi oleh	: Ardiansyah		

NCRNo.	: 2017.02	Issued by	: Ardiansyah
Date Issued	: 17 Februari 2017	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 15 Februari 2018
Standard Ref. & Requirement	: System Certification 4.2.3 The unit of certification shall be the mill and its supply base		
Non-Conformance Description & Evidence observed: Bumi Palma Mill receives FFB from PT Agrotunggal Jayamandiri and Riau PT Kharisma Prima Sentosa which is based on the agreement dated 1 March 2013 and 1 July 2016. Based on the agreement known that the period of cooperation is 5 years or up to 2018 and 2021. Certification unit has not shown the implementation to ensure 100% FFB from outgrowers follow the standards of the RSPO certification within 3 years.			
Root Cause Analysis): PT ATJM and PT KRSP are not yet ready to be certified			

Correction :

The Company communicates to PT KRSP to be willing to supply RSPO-certified FFB on May 23, 2017, then PT KRSP sends a rejection letter following RSPO certification on June 9, 2017.

The Company amended FFB's purchase agreement with PT ATJM and PT KRSP from five (5) years to one (1) year to ensure within 3 years all FFBs shipped by PT ATJM and PT KRSP certified RSPO.

Corrective Action :

The Company regularly socializes RSPO to PT ATJM and PT KRSP to ensure that FFB suppliers to BPMM understand the certification system.

Assessor Evaluation and Conclusion :

15 February 2018

PT BPLP has conducted socialization to PT KRSP and KUD Talang Putih Jaya (supplier PT ATJM) related to RSPO program on May 23, 2017 which was attended by 8 people. On June 9, 2017 the two institutions issued a letter of refusal to follow the RSPO certification because they have not felt any real benefits and have not yet had enough cost.

In addition, PT BPLP conducted addendum III of the FFB processing agreement no. 003 / ADD / KHRE / 05/2017 dated May 3, 2017 which explains that the agreement between PT BPLP and PT KRSP is valid for 1 year or up to 30 June 2018. As for the agreement with PT ATJM and PT BPLP for FFB processing, dated February 28, 2017. The agreement states that the agreement is valid for 1 year or up to February 28, 2018. Based on the evidence of the improvements shown, NCR 2017.02 is closed and will be observed at the next visit.

Verified by : Ardiansyah

3.5.2 Identification of Findings, Corrective Actions and Observations at ASA-4

NCRNo. :		Issued by :	
Date Issued :		Time Limit :	
NC Grade :		Date of Closing :	
Standard Ref. & Requirement :			
Non-Conformance Description & Evidence observed (filled by auditor):			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			

Verified by	:	
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3.5.3 Opportunity for Improvement

No	Ref. Std.	Description Deskripsi
1	1.1.1 Minor	Complementing satellite image information data related to fire monitoring.
2	6.5.2 Major	Employment status information to employees and adjustment of records in payroll
3	8.1.1 Major	Companies are encouraged to monitor the ongoing acquisition of land rights.

1.5.4 Noteworthy Positive Components







No	Descriptions
1	The company's commitment to implement sustainable palm oil management (RSPO, ISPO, ISCC and SMK3)
2	Presentation of documents, staff competence on relevant aspects and good communication.
3	Implementing the re-delineation of company legal limits.

3.6 Summary of Arising Issues from Public, Management and Auditor Response

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>Manpower agency, Indragiri Hilir Regent</p> <ul style="list-style-type: none"> • Company has implemented local workers utilization for operational activities. • There is no issues regarding under age workers. • There is no issues related industrial disputes between company and workers. • Compulsory report has been submitted for regular basis. • Workers wages has been paid based on minimum wage standard. 	<p>There is no negative issues from the government agency. CH has demonstrated compliance with the RSPO criteria 2.1, 4.7, 6.3, 6.5, 6.6, 6.7, 6.11 and 6.12.</p>
<p>Environmental agency, Indragiri Hilir Regent</p> <ul style="list-style-type: none"> • There is no issues regarding landfires during 2017. • There is no issues regarding pollution caused by company. • Company has permit regarding environmental for examples toxic & hazardous waste storage permit, environmental permit, mill effluent disposal permit, etc. • Compulsory report has been submitted for regular basis. 	<p>There is no negative issues from the government agency. CH has demonstrated compliance with the RSPO criteria 2.1, 4.4, 4.6, 5.1, 5.3 and 5.5.</p>
<p>Local (Village) Communities, surrounding of PT BPLP Date and place of interview: 19 February 2018 in Guest house of PT BPLP Interviewee: Representatives from six Villages (samples), which consist of:</p> <ul style="list-style-type: none"> • Three representatives from Village of Bagan Jaya (Chief of Village, Staff of Village Office and one elder). • Two representatives from Village of Lintas Utara. • One representative from Village of Pengalihan. • One representative from Village of Suhada, which also a local contractor. • One representative from Village of Sungai Rukam. • One representative from Village of Pebanan (Parit Kipul). <p>Result Interview:</p> <ul style="list-style-type: none"> • All interviewee mentioned that currently there's is no land conflict and dispute which unresolved with the locals. Compensation payment had settled since 2003. • Conflict and resolution with company has settled up through spirit of kinship. For example, process of compensation payment for the coconut plantation owned by people of Village of Pengalihan and Bagan Jaya, which attacked by <i>Orcytes rhinoceros</i> (rhino beetle) during estate replanting has settled up with compensation agreement about IDR 100,000 per palm. Thereafter, socialization of replanting activities to potential affected villages has conducted by estate management to avoid the same conflict repetition. • All interviewee mentioned that there is no customary land, as well as indigenous people within PT BPLP operational areas. Composition of peoples and ethnic community were considered diverse, such as Malay as Major ethnic, followed by Javanese, Minang, Batak, Bugis, Banjar, etc. However, cultural and religious event such as <i>Eid Qurban, Kuda</i> 	<p>Based on interview result, it could be concluded that presence of company has considered positively affected surrounding community life and contribute to social economic improvement. Communication and coordination towards conflict resolution has smoothly carried out. Department of Public Relation has good relationship with village representatives. Hence, social and environment aspects were satisfactory taken as a part or company operational activity. Further detail from other stakeholder views and document review could be checked on Criteria 1.1, 1.2, 2.2, 5.1, 6.1, 6.2, 6.3, 6.4, 6.8, 6.10 and 6.11 in this report.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p><i>Kepang and Kompang</i> were still supported by company management.</p> <ul style="list-style-type: none"> Majority of village peoples has works as local coconut planters, where planted on peat areas. The company has considered satisfactory cooperative and transparent in providing information, for example towards job vacancies. FFB price, CSR and grants. Village people has recognize company representative (PIC) from Division of Public Relation (PR) which handled this matters. The company has cooperation with local contractors from surrounding villages. Canals as estate property were allowed to be used by surrounded villages for transportation activities. There is no complaints and issues from surrounding villages towards environment aspects 	
<p>Gender Committee</p> <ul style="list-style-type: none"> Menstruation rights and maternity leave rights may be made in accordance with the results of a doctor / nurse examination. These rights are contained in the company's policies and regulations. There is no negative issues such as discrimination and sexual abuse or child labor. Socialization to workers is done through morning briefing and also includes a ban on pregnant and lactating women to spray. 	<ul style="list-style-type: none"> According o document verification and interview with workers, there was n issues related to violation of the rights of woman. From the results of interviews with workers, the company has implemented of Company Policies such as reproductive rights and prohibition of pregnant woman to spray. It refer to criterion 6.9
<p>Workers Union of PT BPLP</p> <ul style="list-style-type: none"> Good industrial relations, every problem can be discussed in kinship so as not to involve a third party (tripartite). Communication between chairman of PUK with DPC chairman and communications chairman of DPC with company so far running well, aspirations of employees have been handled properly. If there is a problem at the unit level will be taken solution in PUK (4 level unit). The problem must exist but can still be communicated. Worker complaints and complaints: the procedure is to report to SP / bipartit - reconciled and resolved at PUK - level if not completed then submitted to the manager level. System becomes a member of SP: there is a statement to join. Likewise when will resign from SP members there is also a mechanism of making a statement by filling out a special form. This is to provide clarity on the status of SP members. Membership fee IDR 10,000.- per worker and other units still totaling IDR 5,000.- deduction of contribution directly from payroll. 	<p>The certificate holder has showed cooperation with worker union. There is no significant industrial issue for 2016. CH has shown the evidence of compliance to RSPO standard criteria 1.1; 4.7; 6.2; 6.3; 6.6; 6.8, 6.9 and 6.12.</p>
<p>Workers Cooperative</p> <ul style="list-style-type: none"> The form of Prima Palma consumer cooperative business today is saving and loan 	<p>The certificate holder has implement fairly cooperation with cooperative. There is no significant industrial issue between both parties. CH has shown the evidence of compliance to RSPO standard criteria 6.11.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<ul style="list-style-type: none"> • Chairman: Lukman Hakim (WTP Factory worker). • Currently the location of the cooperative is located in the factory (Bumi Palma Mill) but the membership is not limited only to factory employees. • Members of the cooperative are voluntary, now all workers are permanent / not permanent members. • The latest RAT of 2016 has been implemented on February 9, 2017. • Based on RAT dated 9 February 2017 members of the current cooperative there are 105 members (from factories only, but the membership is free from Estate and factories). • Deed of establishment of Kopkar Deed Prima Palma No. 21 dated November 19, 2015. • A cooperative relationship with the company quite well. • Basic deposit Rp 50.000, - must be Rp 20.000, - / month. 	

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY						
4.1	Formal Sign-off of Assessment Findings						
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <table border="0" data-bbox="351 828 1324 1164"><tr><td data-bbox="351 828 766 918">PT Bumipalma Lestari Head of Environmental Departement</td><td data-bbox="1053 828 1324 918">Mutuagung Lestari Lead Auditor</td></tr><tr><td data-bbox="462 940 654 1052"></td><td data-bbox="1005 918 1324 1052"></td></tr><tr><td data-bbox="414 1075 702 1164"><u>Ismu Zulfikar</u> Friday, 23 February 2018</td><td data-bbox="1021 1075 1308 1164"><u>Mohamad Amarullah</u> Friday, 23 February 2018</td></tr></table>	PT Bumipalma Lestari Head of Environmental Departement	Mutuagung Lestari Lead Auditor			<u>Ismu Zulfikar</u> Friday, 23 February 2018	<u>Mohamad Amarullah</u> Friday, 23 February 2018
PT Bumipalma Lestari Head of Environmental Departement	Mutuagung Lestari Lead Auditor						
							
<u>Ismu Zulfikar</u> Friday, 23 February 2018	<u>Mohamad Amarullah</u> Friday, 23 February 2018						

Appendix 1. List of Stakeholder Contacted in the RSPO Certification Process

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Manpower Agency	Tembilahan, District of Indragiri Hilir, Province of Riau.	-	Interview	20 February 2018	√	
2	Environmental Agency	Tembilahan, District of Indragiri Hilir, Province of Riau.	-	Interview	20 February 2018	√	
3	Suhada Village (local contractor, head of sawit hemlet)	District of Indragiri Hilir, Province of Riau.	-	Interview	20 February 2018	√	
4	Representatives from six Villages (samples), which consist of: <ul style="list-style-type: none"> • Three representatives from Village of Bagan Jaya (Chief of Village, Staff of Village Office and one elder). • Two representatives from Village of Lintas Utara. • One representative from Village of Pengalihan. • One representative from Village of Suhada, which also a local contractor. • One representative from Village of Sungai Rukam. • One representative from Village of Pebanan (Parit Kipul). 	District of Indragiri Hilir, Province of Riau.	-	Interview	20 February 2018	√	
8	Workers Union of PT BPLP	District of Indragiri Hilir, Province of Riau.	-	Interview	20 February 2018	√	
9	Gender Committee of PT BPLP	District of Indragiri Hilir, Province of Riau.	-	Interview	20 February 2018	√	
10	Workers Cooperative of PT BPLP	District of Indragiri Hilir, Province of Riau.	-	Interview	20 February 2018	√	
11	<p>Bumi Palma Mill: 2 security, 1 FFB grader, 1 weigh bridge operator, 1 operator from sterilizer, thresher, sludge tank, press, engine room stations and from WTP stations.</p> <p>Bumi Lestari Estate 1 Harvester, 1 loosefruit picker and 2 Pesticide applicators:</p> <p>Bumi Sentosa Estate 3 pesticide applicator (in manual upkeep works) and 1 IPM census worker.</p>	District of Indragiri Hilir, Province of Riau.	-	Interview	20 – 22 February	√	

Appendix 2. Assessment Program

DATE	19 – 24 February 2018	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 19 February 2018		
06.00 – 16.00	Jakarta → Pekanbaru → PT BPLP	• All Team
16.00 – 17.00	Opening Meeting	
Tuesday, 20 February 2018		
08.00 - 12.00	Public consultation to: <ul style="list-style-type: none"> • Communities (if any local contractor) • Contractor, Supplier, internal stakeholder (labor union, gender committee and cooperative employees) • Government Institution of Indragiri Hilir District 	<ul style="list-style-type: none"> • MAH/MAY • RAH/YHN • STM
12.00 – 14.00	BREAK	
14.00 – 17.00	Field Observation at Bumi Palma Mill <ul style="list-style-type: none"> • POM (security, weighbridge, loading ramp, process, engine room, workshop, boiler) • WTP, WWTP, Hazardous Waste Warehouse/TPS limbah B3, drainage, collecting place of solid waste (EFB, fiber, shell), methane capture (if any), composting (if any) • SCCS • TBP & Partial Certification 	<ul style="list-style-type: none"> • RAH/YHN • STM • MAR • MAY
Wednesday, 21 February 2018		
08.00 - 12.00	Field Observation Bumi Lestari Estate <ul style="list-style-type: none"> • Manuring, Spraying, Harvesting, Best Agricultural Practices • Worker Welfare (payments, complaint mechanism) • Hazardous Waste Material Management, storage • Worker facilities (housing, health clinic, clean water, etc) • Conservation, landfill, land application • Legal boundaries 	<ul style="list-style-type: none"> • YHN/MAY • YHN/MAY • RAH • RAH • STM • MAR
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> • Clarification of field visit and document review • Completion Checklist 	• ALL TEAM
Thursday, 22 February 2018		
08.00 – 12.00	Field Observation Bumi Sentosa Estate <ul style="list-style-type: none"> • Manuring, Spraying, Harvesting, Best Agricultural Practices • Worker Welfare (payments, complaint mechanism) • Hazardous Waste Material Management, storage • Worker facilities (housing, health clinic, clean water, etc) • Conservation, landfill, land application • Legal boundaries 	<ul style="list-style-type: none"> • YHN/RAH • YHN/RAH • MAY • MAY • STM • MAR
12.00 – 14.00	BREAK	
14.00 – 17.00	<ul style="list-style-type: none"> • Clarification of field visit and document review 	• ALL TEAM

DATE	19 – 24 February 2018	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> Completion Checklist 	
Friday, 22 February 2018		
08.00 – 08.30	Field Observation at Bumi Palma Estate (if necessary) and Document Review	• ALL TEAM
12.00 – 14.00	BREAK	
14.00 – 15.00	Internal Meeting / Preparation for closing meeting	• ALL TEAM
15.00 – 17.00	Closing Meeting	• ALL TEAM
Saturday, 24 February 2018		
06.00 – 16.00	PT BPLP → Pekanbaru	• ALL TEAM
17.00 –	Pekanbaru → Jakarta	