

# RSPO PRINCIPLES & CRITERIA

## PUBLIC SUMMARY REPORT

### ANNUAL SURVEILLANCE ASSESSMENT 3

Indonesia  
**PT STEELINDO WAHANA PERKASA**  
**Kuala Lumpur-Kepong Berhad**  
2017

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RSPO Membership Number	8-0025-06-000-00
RSPO Approval Date	12/01/2006
Affiliate Membership	<a href="http://www.rspo.org/en/member/339">http://www.rspo.org/en/member/339</a>

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## PART 1: SCOPE OF THE CERTIFICATION ASSESSMENT AUDIT

### 1.1 Company and Contact Details

Company Name:	Kuala Lumpur Kepong Berhad
Business Address:	Wisma Taiko, 1, Jalan S. P. Seenivasagam, 30000 Ipoh, Perak. Malaysia.
Contact Person:	Mr. Sin Chuan Eng
Office Telephone:	+6052417844
E-Mail:	<a href="mailto:ce.sin@klk.com.my">ce.sin@klk.com.my</a>
Web Site:	<a href="http://www.klk.com.my">www.klk.com.my</a>
Other Certifications Held:	RSPO SCC, ISCC

### 1.2 RSPO Membership & Certification Details

RSPO Membership Number:	1-0014-04-000-00
Registered Client Name:	Kuala Lumpur Kepong Berhad
Certificate Number:	CU-RSPO- 843387
Start Date Of Certificate:	06-01-2015
End Date Of Certificate:	05-01-2020
Date Of Original Certification:	06-01-2015
Scope:	Certification of the Palm Oil Mill and Supply Bases
Type Of Certification:	Single site <input checked="" type="checkbox"/>
Duration Of Certificate:	5 Years from date of certification

### 1.3 Annual Surveillance Assessment Details

Dates Of This Audit:	06 - 09 November 2017
Audit Number:	ASA 3

### 1.4 Assessment Type

This is a RSPO Principles & Criteria Compliance assessment of the palm oil mill and its respective supply bases as listed in this report below.

### 1.5 Location of the Palm Oil Mill

Name Palm Oil Mill (POM)	Mill Capacity MT/Hour	Location Address	GPS Reference	
			Longitude	Latitude
PT. Steelindo Wahana Perkasa POM	120	Desa Senyubuk, Kec. Kelapa Kampit, Belitung Timur	108°03.835' E	02°43.535' S

### 1.6 Palm Oil Mill Output and Approximate Tonnages Certified

If the Mill is receiving FFB from uncertified supply bases outside the audit scope, such uncertified sources is highlighted under the following sections as seen applicable:

- PART 1, Section 1.7 – General Description of Supply Base,
- PART 2: Partial Certification, Section 2.4 – Uncertified Units or Holdings,
- PART 5: RSPO Supply Chain Certification of this report

Projected Production from the last 12 Months (MT) Oct' 16 – Sept' 17			Actual Production for this Audit Year (MT) Oct' 16 – Sept' 17			Projected 12 Months (MT) Forecast Certified in this Report Oct' 17 – Sept' 18		
FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
512,205	111,405	28,171	372,864.51	76,156.48	19,094.35	480,626	103,335	26,434

Note : refer to part 5.2 for e-trace certified volume

### 1.7 General Description of Supply Base

No changes identified for the mill processing capacity of 120 MT FFB/ hour is connected to biogas plant. The supply bases for the mill from this ASA 3 onwards is only from own estates PT. Steelindo Wahana Perkasa. Seen the PT. Steelindo Wahana Perkasa consist of 4 main divisions as details below:

- Kebun Barat – 5KM to SWP mill [100% FFB to SWP POM]
- Kebun Utara - 5KM to SWP mill [100% FFB to SWP POM]
- Kebun Timur - 15KM to SWP mill [100% FFB to SWP POM]
- Kebun Selatan - 36KM to SWP mill [100% FFB to SWP POM]

There is no scheme smallholder supplying to the mill and this was confirmed in the “FFB/LF Contributors Summary report”. This process has resulted PT. Steelindo Wahana Perkasa POM conformance to RSPO supply chain IP Module.

#### 1.7.1 Location of the Supply Base

OPP	Oil Palm Plantation	Location	GPS reference		Area Summary (Ha)	
	Name	Address	Longitude	Latitude	Total	Mature
OPP 1	PT Steelindo Wahana Perkasa	Ds. Senyubuk. Kecamatan Kelapa Kampit. Belitung Timur	108° 00' 41" E	02° 42' 58" S	14,065	13,351
<b>TOTAL</b>					<b>14,065</b>	<b>13,351</b>

#### 1.7.2 Statistics of the Supply Base and Estimated Tonnes of FFB produced per year

OPP	Oil Palm Plantation	Estimated FFB/Year (MT) Aug' 16 – July' 17	Planting Years	Cycle (Years)
OPP 1	PT Steelindo Wahana Perkasa	480,626	1995, 1996, 1997	25
<b>TOTAL</b>		<b>480,626</b>		

Only use data from 1.7.3 in the eTrace Summary

#### 1.7.3 Conservation and HCV Area (Ha)

OPP	Oil Palm Plantation	Conservation Area (Ha)	HCV Area (Ha)	* HCV part of Conservation
OPP 1	PT Steelindo Wahana Perkasa		520.41	No
<b>TOTAL</b>			520.41	

\* Indicate if HCV area is part of the Conservation Area. If the HCV area is part of the Conservation Area, then “YES” otherwise, “No”

#### 1.7.4 Percentage of Planted Oil Palm by different Age Ranges

OPP	Planting Years by 5 year Ranges				Total
	1991-1995	1996-2000	2001-2005	2006-2010	
OPP1	13.88 %	86.12 %	-	-	100 %

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

$N = 0.8\sqrt{Y}$ , where “Y” is the number of units, with the result always to be rounded “up” to the next whole integer. Where only a sample of the supply base is assessed, units not previously assessed, or assessed earlier in the certification program, are to be preferred over those more recently assessed

**For the Mill, how many units make up the production base?**

Owned estates (Y)	$N = 0.8\sqrt{Y}$	Smallholders (Z)	$N = 0.8\sqrt{Z}$
1	1	-	-

**Explanation as to the selection of estates sampled**

Only one estate was assessed

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

Progress of associated Smallholders or Out-growers towards Compliance with relevant Standards - should be in accordance to the 3 year implementation plan, if applicable to this assessment

Not Applicable

### 1.9 Location Map for this Certification Unit (See Appendix 1)

## PART 2: PARTIAL CERTIFICATION

The rules for partial certification allow organizations that have a majority holding in and / or management control of more than one autonomous company growing oil palm to certify individual management units and / or subsidiary companies subject to certain rules.

### 2.1 Management Structure

Section	Criteria	Yes/No	If "Yes"	If "No"
2.1.1	Is the certified operation (POM and supply base as detailed above) a stand-alone operation and there are no other plantations or mills owned by the same company?	No	Section 2 is N/A	Go to 2.1.2
2.1.2	Is the certified operation part of a simple structure of operations owned by one company?	Yes	Go to 2.1.5	Go to 2.1.3
2.1.3	Are there statements of the ultimate controlling shareholders and directors in the managing agency company/companies: a. Explaining the legal relationship and the management arrangements with the subsidiary companies and / or with any operating groups?	-	Go to 2.1.4	Go to 2.2.1
2.1.4	b. A statement of commitment to complying with the spirit of the RSPO for all companies and subsidiaries involved with the growing of oil palm and for the production of palm oil?	-	Go to 2.4	Go to 2.2.2
2.1.5	Is there a time bound plan in place for all subsidiaries, estates and palm oil mills?	Yes	Go to 2.3	2.2.3
2.1.6	Is the parent company or one of its majority owned and / or managed subsidiaries a member of RSPO.	Yes		

### 2.2 Non-compliance Identified with 2.1 Above

Section	Non-compliance findings	NC raised	Category
2.2.1	There is no explanation as to the company's structure and therefore it is not possible to conduct an effective audit against the rules for partial certification.	-	Major
2.2.2	There is no statement of commitment to complying with the spirit of the RSPO for all companies within the company structure.	-	Major
2.2.3	There is no time bound plan in place for the certification for all subsidiaries, estates and mills.	-	Major
2.2.4	No applicable membership of the RSPO.	-	Major

### 2.3 Summary of the Time Bound Plan

Section	Requirement	Findings and any action required	Compliance
2.3.1	Does the plan include all subsidiaries, estates and mills?	The time bound plan does include of the subsidiaries, mills and estates owns by KLK. The Paloh Palm Oil Mill in Johor (currently running alternatively and under consideration on	Yes

		top management to shutdown) and Mill 1 in Sabah are not part of the time bound plan as it meant for out growers and smallholder group. The status is independent mill which is received 100% FFB from independent smallholders.  This has been communicated with RSPO in 2015.	
2.3.2	Is the time bound plan challenging? ➤ Age of plantations. ➤ Location. ➤ Mill development. ➤ Infrastructure. ➤ Compliance with applicable law.	The plan is achievable unless otherwise with unforeseen circumstances. The risk involves varies from: <ul style="list-style-type: none"> <li>• To engage certification bodies and their availability.</li> <li>• Laws and regulations in Indonesia – a lot uncertainty.</li> <li>• In Indonesia ISPO precede other certification standards.</li> <li>• In Indonesia, it finds mobilizing the internal resources to different geographical locations.</li> <li>• Land compensation process with RSPO</li> </ul>	Yes
2.3.3	Have there been any changes since the last audit? Are they justified?	The latest time bound plan dated on 22/04/2016 was reviewed and changes were discussed during verification. In Kaltim, Jabontara POM had been newly included. Both Jabontara and Berau mill target to be certified by 2017 which a year delay [2016] than planned. This was due to RSPO Compensation Scheme [Compensations Concept Note was submitted to RSPO].	Yes
2.3.4	If there have been changes, what circumstances have occurred?	New inclusion of mill and supply base. No changes on the targeted time line.	Yes
2.3.5	Have there been any stakeholder comments?	On PT Menteng Jaya Sawit Perdana IUP for 7,400 Ha approval no: 525.26/153/II/EKBANG/2007 dated on 13 February 2007 and Izin Lokasi (IL) is renewed and documented no: 188.45/359/HUK-BPN/2013 dated: 1 <sup>st</sup> August 2013 which includes an approval clause 1a that this IL will remain in force until land swap process is finalised and as at now, the land / boundary survey on-going.  3,509 Ha has been approved to spend for Hutan Tanaman Rakyat (SK.659/Menlhk/Setjen/PLA.2/8/2016) 26 Aug 2016.	Yes
2.3.6	Have there been any newly acquired subsidiaries?	Refer below time bound plan.	Yes
2.3.7	Have there been any isolated lapses in the implementation of the plan?	No lapses  Lapses found been justified from land compensation process with RSPO.	Yes
2.3.8	Has there been any systematic failure to proceed with the implementation of the plan?	No	Yes
2.3.9	General statement as to progress made since the last audit?	The target to certify all the units within year 2017 remain same.	Yes

2.4 Un-Certified Units or Holdings			
Section	Requirement	Findings and any action required	Compliance
<b>NOTE:</b> Companies may demonstrate compliance by clear evidence of a self-audit (i.e. an internal audit for all subsidiaries, estates and Palm Oil Mills)			
2.4.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Since all the facilities in Malaysia were certified, therefore the facilities in Indonesia monitor by the Pak Steven and once in 3 months, a review with Sustainability Head will be done in KLK HQ in Ipoh. The internal control points have included all the requirements to validate the compliance against uncertified units or holdings as per partial.</p> <p>Joint venture in Liberia does not required internal audit as it is part of EPO as stand-alone entity.</p> <p>However, starting from 2017 Liberia units has been included in this year time bound plan as starting this year, all communication related to EPO will be under KLK. Sighted email communication on March 2017 with RSPO.</p>	Yes
2.4.2	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	There will either be a moratorium on development or for new areas to be developed the HCS Approach method will be employed until the exercise of convergence is completed.	Yes
2.4.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	There is no NPP applicable. There will either be a moratorium on development or for new areas to be developed the HCS Approach method will be employed until the exercise of convergence is completed.	Yes
2.4.4	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>PT Adei Plantation land conflicts around 2,544 Ha are still in progress of negotiation and the land area been enclave.</p> <p>Process completed with all 2,544 Ha land has been enclave to Masyarakat Sakai Melayu/Jiat and Tanah Putih and been taken out from PT. Adei HGU. Sighted email evidence from the GM dated on 9 Aug 2017.</p>	Yes
2.4.5	Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>None noted.</p> <p>No stakeholder comments or complaints received through central complaint record in HQ. All uncertified units in Indonesia has passed the Stage 1 audit for ISPO. In Liberia units, any complaint also will come through central complaint procedure.</p> <p>Further, complaint procedure available in respective units and internally been verified during company internal audit.</p>	Yes



2.4.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	None noted. No legal non-compliance.	Yes
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TIME BOUND PLAN FORECAST FOR RSPO CERTIFICATION OF ALL PALM OIL MILLS & SUPPLY BASES						
s/n	Palm Oil Mill	Country	Supply Bases (estates, plantations, associations)	Area [Ha]	Targeted RSPO Certification Year	Current Certification Status as per this Audit
1	Batu Lintang	Kulim, Kedah, Malaysia	Pelam Estate*	2,960	2013	Certified
		Serdang, Kedah, Malaysia	Batu Lintang Estate* Buntar Estate	1,808 899		
		Batu Kurau, Perak Malaysia	Subur Estate	1,290		
2	Kekayaan	Paloh, Johor, Malaysia	Landak Estate Kekayaan Estate Paloh Estate	4,451 4,436 2,029	Oct 2011	Certified
		Tenang, Johor, Malaysia	Voules Estate* New Pogoh Estate*	2,969 1,545		
		Kulai, Johor, Malaysia	Fraser Estate	2,928		
		Bekok, Johor, Malaysia	Sg Bekok Estate	625		
		Pagoh, Johor, Malaysia	Ban Heng Estate	631		
		Renggam, Johor, Malaysia	See Sun Estate	589		
		Bandar Tenggara, Johor, Malaysia	Sg Peggeli Estate	942		
3	Jeram Padang	Bahau, Negeri Sembilan, Malaysia	Ayer Hitam Estate Jeram Padang Estate*	2,640 2,114	Sept 2012	Certified
		Telemong, Pahang, Malaysia	Renjok Estate* Tuan Estate*	1,578 1,353		
		Lanchang, Pahang, Malaysia	Sg Kawang Estate*	1,889		
		Rompin, Negeri Sembilan, Malaysia	Batang Jelai Estate*	2,148		
		Simpang Durian, Negeri Sembilan, Malaysia	Gunung Pertanian Estate*	686		
		Pedas, Negeri Sembilan, Malaysia	Ulu Pedas Estate*	922		
		Rantau, Negeri Sembilan, Malaysia	Kombok Estate*	1,915		
4	Tanjong Malim	Tanjong Malim, Perak, Malaysia	Changkat Asa Estate*	1,716	2013	Certified

		Kerling, Selangor, Malaysia	Kerling Estate*	619		
		Serendah, Selangor, Malaysia	Sg Gapi Estate	603		
5	Tuan Mee	Sungai Buloh, Selangor, Malaysia	Tuan Mee Estate	1,556	2013	Certified
6	Kuala Pertang	Kuala Krai, Kelantan, Malaysia	Pasir Gajah Estate	2,107	By 2014	Certified
		Tanah Merah, Kelantan, Malaysia	Kerilla Estate* Sg Sokor Estate*	2,176 1,603		
7	Mill 2	Tawau, Sabah, Malaysia	Pang Burong Estate Sri Kunak Estate Tundong Estate Ringlest Estate	2,548 2,770 2,155 1,834	March 2009	Certified
8	Pinang	Tawau, Sabah, Malaysia	Jatika Estate Sigalong Estate Pangeran Estate Pinang Estate	3,508 2,864 2,855 2,420	March 2009	Certified
9	Lungmanis	Lahad Datu, Sabah, Malaysia	Tungku Estate Bukit Tabin Estate Lungmanis Estate	3,418 2,916 1,656	July 2010	Certified
10	Rimmer	Lahad Datu, Sabah, Malaysia	Rimmer Estate Sg. Sibalukan	2,730 2,654	July 2010	Certified
11	Bornion	Kinabatangan, Sabah, Malaysia	Bornion Estate Segar Usaha Estate	3,233 2,792	July 2010	Certified
12	Changkat Chermin	Manjung, Perak, Malaysia	Lekir Estate Changkat Chermin Estate Raja Hitam Estate	3,313 2,530 1,497	2013	Certified
		Parit, Perak, Malaysia	Glenealy Estate* Serapoh Estate*	1,059 936		
		Padang Rengas, Perak, Malaysia	Kuala Kangsar Estate*	843		
		Trong, Perak, Malaysia	Allagar Estate	805		
13	Berau	Berau, Kaltim, Indonesia	Kebun Malindomas Perkebunan, Kebun Hutan Hijau Mas, Kebun Anugrah Surya Mandiri	7,971 [2006] 7,317 [2006] 2,682	By 2017 2018 (Pending compensati on process from RSPO)	Pending
14	Jabontara	Berau, Kaltim, Indonesia	Kebun Jabontara Eka Karsa	14,086 [2007]	By 2017	Audited in March
15	Steelindo Wahana Perkasa	Belitung, Indonesia	Kebun Steelindo Wahana Perkasa	14,065	By 2013	Certified (2015)
16	Parit Sembada	Belitung, Indonesia	Kebun Parit Sembada	3,990	By 2015	Certified
			Kebun Alam Karya Sejahtera	2,336 [2009]	By 2018 (Under review)	

					consignment note for compensation)	
17	Mandau	Riau, Sumatera, Indonesia	Kebun Mandau*	14,799	Oct 2012	Certified
18	Nilo 1	Riau, Sumatera, Indonesia	Kebun Nilo Timur	12,860	By 2013	Certified (2014)
			Kebun Nilo Barat		By 2013	Certified (2014)
19	Nilo 2	Riau, Sumatera, Indonesia	Kebun Mutiara	1,400 [2005]	By 2018 (Stage 1 – pre-assessment done Feb 2017)	Pending
20	Tapung Kanan	Riau, Sumatera, Indonesia	Kebun Sekarbumi Alamlestari	6,200	By 2013	Certified
21	Stabat Mill (PT. Langkat Nusantara Kepong)	Langkat, Sumatera Utara, Indonesia	Kebun Basilam*	2,697 [2001]	By 2017	Certified on August
			Kebun Gohor Lama*	3,323 [1992]		
			Kebun Tanjung Beringin	3,936 [2000]		
		Langkat, Sumatera Utara, Indonesia	Kebun Padang Brahrang	1,949 [1979]	By 2017	Certified on August
			Kebun Bukit Lawang	1,377 [1995]		
			Kebun Tanjung Keliling	2,407 [2407]		
			Kebun Bekiun	2,979 [1984]		
			Kebun Maryke	2,704 [2007]		
22	MAP	Mentaya Hulu, Kalteng Indonesia	Kebun Karya Makmur Abadi	13,148 9397 Ha (HGU 73/HGU/K EM-ATR/BPN/2016 dated 28 Oct 2016) 3406 Ha (in progress of HGU) [2008]	By 2017	Pending
		Kebun Mulia Agro Permai, Baamang, Kalteng Indonesia	Kebun MAP	9,056 [2006]		
		Kebun Menteng Jaya Sawit	Kebun Menteng Jaya Sawit Perdana	5,893 [2009]		

		Perdana, Mentaya Hilir, Kalteng Indonesia				
23	Equatorial Palm Oil	Palm Bay Estate	County Bassa	13,007 [2013]	2022	Pending
		Butaw Estate	Sinoe County	8,011 [2013]		

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

PT. Langkat Nusantara Kepong operates on the property owned by the joint venture partner, PT. Perkebunan Nusantara II.

With reference to time bound plan, the following issues were reviewed openly with the Control Union audit team during the assessment and which may be in conflict with the rules for partial certification, if applicable	
Name of Mill or Plantation	*Area of concern (See examples below)
N/A	N/A
Include any known concerns, media reports and major issues both present and from the past covering, for example: <ul style="list-style-type: none"> <li>• Replacement of primary forest or any area containing HCV's since November 2005.</li> <li>• Evidence of non-compliance with the law</li> <li>• Legal issues</li> <li>• Compensation payments</li> <li>• Social relations</li> <li>• Burning</li> <li>• Labor disputes</li> </ul>	

## 2.5 Summary of the findings for Partial Certification

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

This 2017 verification was attended by Mr. Sin Chuan Eng and Ms. Lee Kuan Yee from the Sustainability Department. On behalf of CUC, Supun Sachithra Nigamuni [General Manager] Muhd Jamalul Arif [Scheme Coordinator], Nur Atiqah [Certifier], Mr. Izzat [Planner] were involved. The verification was found satisfactory with documented evidences of latest time bound plan, detail discussions on NPP and the challenges in meeting the time bound plan. There were no non-conformities found, below is the status of land bank owned by KLK [certified and none].

Country	Region	Name of POM	Area [Ha]
Malaysia	Peninsular Malaysia	Batu Lintang	61,508
		Tanjung Malim	
		Kekayaan	
		Tuan Mee	
		Paloh	
		Changkat Chermin	
		Jeram Padang	
		Kuala Pertang	
	Sabah	Mill 1	40,353
		Mill 2	
		Rimmer	
		Bornion	
		Lungmanis	
		Pinang	
Indonesia	Kaltim	Berau	32,056

		Jabontara	
	Riau	Mandau	35,259
		Nilo 1	
		Nilo 2	
		Tapung Kanan	
	Belitung	Parit Sembada	20,391
		Steelindo Wahana Perkasa	
	Sumatera Utara	Gohor Lama	21,372
		Padang Brahrang	
	Kalteng	MAP	28,097
<b>Total</b>			<b>239,036</b>

## 2.6 Partial Certification Audit Agenda

Date	Location	Agenda
28/08/2017	KLK Wisma Taiko, Ipoh	Documentation review and interview.

## PART 3: AUDIT PROCESS

### 3.1 About the Certification Body

Control Union Certifications is a member of the Control Union World Group – an international inspection and certification body. CUC performs Audits and certification in many agricultural based fields such as FSC, RSPO, and Organic production, Sustainable Textile Production, Organic Exchange, GLOBALGAP, HACCP, BRC, GMP and GTP.

CUC is accredited by the Dutch Council of Accreditation (RVA) on the European quality standard EN 45011 for the inspection and certification of CUC Organic program (according to the EU regulation 2092/91) and EUREPGAP program. When requested a copy of the accreditation certificate can be obtained from CUC.

**Control Union (Malaysia) Sdn Bhd is a registered affiliate member of RSPO and is a private limited company owned by the Control Union World Group based in Malaysia. Control Union (Malaysia) Sdn Bhd is authorized to conduct and issue certification on behalf of RSPO and Control Union Certifications.**

### 3.2 Audit Team

<b>Lead auditor:</b>	<b>Ahmad Furqon</b>
Team member 1:	Ryanza Prasetya
Team member 2:	Nor Ashikin Shafinaz

#### 3.2.1 Qualifications of the Lead Auditor

Requirement	Qualifications
A minimum of post high school (post-secondary school) training in either agriculture/forestry, environmental science or social sciences;	Post graduate qualification in agriculture with more than 5 years working experience in various plantation company. Completed and certified ISO 9001:2015, ISO 14001.
At least 5 years professional experience in area of work relevant to the assessment (e.g., palm oil management; agriculture/forestry; ecology; social science);	More than 05 years of working experience in plantation with various plantation company. Fully trained in similar agriculture certification programs such as RSPO, ISPO and SCCS.
Training in the practical application of the RSPO criteria, and RSPO certification systems;	Involved in RSPO assessment since 2016. Involved in RSPO audits conducted in Indonesia.
Successfully completion of an ISO 9000:19011 lead	Attended and successfully completed ISO 9001:2015 Lead

auditors course;	Auditor course in June 2016.
Training in the practical application of RSPO certification systems.	Involved in RSPO assessment since 2016. Involved in RSPO audits conducted in Indonesia.
A supervised period of training in practical auditing against the RSPO criteria or similar sustainability standards, with a minimum of 15 days audit experience and at least 3 audits at different organizations.	Involved in audits conducted in for many different companies in Indonesia.
RSPO endorsed lead auditors course.	Attended and successfully completed RSPO Lead Auditor training in October 2016.
Signed code of conduct.	Yes
<b>General knowledge of:</b>	
• RSPO P&C standards.	Yes
• CUC organizational structure.	Yes
• CUC quality systems.	Yes
• Lead auditor role.	Yes
• Report writing.	Yes
• Stakeholder consultation.	Yes
• Certification decision process.	Yes
• RSPO SCCS program manual.	Yes
• CUC filing systems.	Yes
• Correct use of RSPO trademarks.	Yes
• History and objectives of RSPO.	Yes
• CV available.	Yes
Completion of CUC RSPO lead auditor training.	Yes

### 3.2.2 Qualifications of the Assessment Team

RSPO Requirement	Team Member Name	Qualifications
	Ryanza Prasetya	Fluent in both English and Bahasa
	Nor Ashikin Shafinaz	Fluent in both English and Bahasa
Field working experience in the palm oil sector, or a demonstrable equivalent.	Ryanza Prasetya	Graduated from University of Gadjah Mada Yogyakarta Indonesia in Chemical Engineering. Has 1 year working experience in oil palm plantation (Safety, Health, Environment Supervisor) and 3 year as auditor in PT. PCU Indonesia (GOTS, GRS, RCS, OCS, RFS, ISCC, HVO, URSA, RSPO, Due Dilligence Audit). Trained on ISO 9001, ISO 14001, ISCC EU, RSPO P&C
	Nor Ashikin Shafinaz	Graduated from Universiti Kebangsaan Malaysia in Chemical Engineering. Been Part of RSPO P&C Audit team member and SCC audits in Malaysia and Indonesia. Trained on ISO 9001, GAP, Social and Environment. Successfully completed Lead Auditor RSPO P&C Course, Lead Auditor RSPO SCC Course and Lead Auditor ISO 9001:2015 Course.
Good agricultural practices (GAP), integrated pest	Ryanza Prasetya	Graduated from University of Gadjah Mada Yogyakarta Indonesia in Chemical Engineering. Has 1 year working experience in oil palm

management (IPM), pesticide and fertilizer use.		plantation (Safety, Health, Environment Supervisor) and 3 year as auditor in PT. PCU Indonesia (GOTS, GRS, RCS, OCS, RFS, ISCC, HVO, URSA, RSPO, Due Dilligence Audit). Trained on ISO 9001, ISO 14001, ISCC EU, RSPO P&C
	Nor Ashikin Shafinaz	Graduated from Universiti Kebangsaan Malaysia in Chemical Engineering. Been Part of RSPO P&C Audit team member and SCC audits in Malaysia and Indonesia. Trained on ISO 9001, GAP, Social and Environment. Successfully completed Lead Auditor RSPO P&C Course, Lead Auditor RSPO SCC Course and Lead Auditor ISO 9001:2015 Course.
Health and Safety auditing on the farm and in processing facilities. (For example OHSAS 18001 or occupational. Health and safety assurance system).	Ryanza Prasetya	Graduated from University of Gadjah Mada Yogyakarta Indonesia in Chemical Engineering. Has 1 year working experience in oil palm plantation (Safety, Health, Environment Supervisor) and 3 year as auditor in PT. PCU Indonesia (GOTS, GRS, RCS, OCS, RFS, ISCC, HVO, URSA, RSPO, Due Dilligence Audit). Trained on ISO 9001, ISO 14001, ISCC EU, RSPO P&C
	Nor Ashikin Shafinaz	Graduated from Universiti Kebangsaan Malaysia in Chemical Engineering. Been Part of RSPO P&C Audit team member and SCC audits in Malaysia and Indonesia. Trained on ISO 9001, GAP, Social and Environment. Successfully completed Lead Auditor RSPO P&C Course, Lead Auditor RSPO SCC Course and Lead Auditor ISO 9001:2015 Course.
Workers welfare issues and social auditing experience. (For example with SA8000 or related social or ethical accountability codes).	Ryanza Prasetya	Graduated from University of Gadjah Mada Yogyakarta Indonesia in Chemical Engineering. Has 1 year working experience in oil palm plantation (Safety, Health, Environment Supervisor) and 3 year as auditor in PT. PCU Indonesia (GOTS, GRS, RCS, OCS, RFS, ISCC, HVO, URSA, RSPO, Due Dilligence Audit). Trained on ISO 9001, ISO 14001, ISCC EU, RSPO P&C
	Nor Ashikin Shafinaz	Graduated from Universiti Kebangsaan Malaysia in Chemical Engineering. Been Part of RSPO P&C Audit team member and SCC audits in Malaysia and Indonesia. Trained on ISO 9001, GAP, Social and Environment. Successfully completed Lead Auditor RSPO P&C Course, Lead Auditor RSPO SCC Course and Lead Auditor ISO 9001:2015 Course.
Environmental and ecological auditing. (For example experience with organic agriculture, ISO 14001 or environmental	Ryanza Prasetya	Graduated from University of Gadjah Mada Yogyakarta Indonesia in Chemical Engineering. Has 1 year working experience in oil palm plantation (Safety, Health, Environment Supervisor) and 3 year as auditor in PT. PCU Indonesia (GOTS, GRS, RCS, OCS, RFS, ISCC, HVO,

management systems).		URSA, RSPO, Due Dilligence Audit). Trained on ISO 9001, ISO 14001, ISCC EU, RSPO P&C
	Nor Ashikin Shafinaz	Graduated from Universiti Kebangsaan Malaysia in Chemical Engineering. Been Part of RSPO P&C Audit team member and SCC audits in Malaysia and Indonesia. Trained on ISO 9001, GAP, Social and Environment. Successfully completed Lead Auditor RSPO P&C Course, Lead Auditor RSPO SCC Course and Lead Auditor ISO 9001:2015 Course.
Economic issues.	Ryanza Prasetya	Graduated from University of Gadjah Mada Yogyakarta Indonesia in Chemical Engineering. Has 1 year working experience in oil palm plantation (Safety, Health, Environment Supervisor) and 3 year as auditor in PT. PCU Indonesia (GOTS, GRS, RCS, OCS, RFS, ISCC, HVO, URSA, RSPO, Due Dilligence Audit). Trained on ISO 9001, ISO 14001, ISCC EU, RSPO P&C
	Nor Ashikin Shafinaz	Graduated from Universiti Kebangsaan Malaysia in Chemical Engineering. Been Part of RSPO P&C Audit team member and SCC audits in Malaysia and Indonesia. Trained on ISO 9001, GAP, Social and Environment. Successfully completed Lead Auditor RSPO P&C Course, Lead Auditor RSPO SCC Course and Lead Auditor ISO 9001:2015 Course.

### 3.3 Audit Methodology

#### 3.3.1 General Overview

The Audit was carried out in conformity with the procedures as laid down in the CUC Procedure Manual and the RSPO Program Manual for the auditors and Certifier. During the Audit the qualified CUC auditors used the RSPO standard as endorsed for the country in which the audit took place and recorded their findings.

Workers and local communities were interviewed and evidence sought to confirm ongoing compliance to include:

- **Chemical stores.** Storage, MSDS leaflets, Herbicide mixing areas, PPE, Ventilation, Security.
- **Field inspections.** Herbicide application programs. Harvesting sites and efficiency. Fertilizing operations. SOP's. Soil maps. Land preparation. Ground cover. IPM. First aiders and boxes. Ground cover. Soil erosion. Field observations of all operations.
- **Worker interviews.** OSH. Sexual, religious, racial harassment. Pay and contracts. Child labor. First aid. Awareness.
- **Re-planting sites.** Zero burn.
- **HCV's.** Identification. Management plans. Environmental Impact Assessments. Implementation.
- **Riparian zones.** Width. Current and future management. Non maintenance regimes.
- **Water management.** Water courses. Water monitoring.
- **Road maintenance.** Run off.
- **Social amenities.** Social Impact Audits.
- **Local communities.** Contributions made. Employment opportunities. Social impacts. Complaints procedures.
- **Workshops.** Oil traps. Safe working environment. PPE. Diesel tanks. Environmental waste management.
- **Line sites.** Interviews with householders. Inspection of water discharge points. Water improvement plans. Waste disposal.
- **Documentation review.**



**The Palm Oil Mill audit verification included the following activities:**

- **Mill and workshop inspections.** Documentation review & worker interviews.
- **Mill.** SOP's. Safe working environment. Gen sets. Walk ways. Signs. EFB. POME treatment. Emissions. Mass balance. Diesel tanks. PPE. Fire extinguishers. First aiders and boxes. Fuel and water usage.
- **OSH.** Training. Management structure. First aiders.
- **Full document review.** Completion of the checklist. Review and documentation of evidence. All aspects of RSPO P&C's applicable.
- **Worker interviews.** OSH. Sexual, religious, racial harassment. Pay and contracts.
- **Compliance against the RSPO SCCS certification scheme.**

**Verification:**

Verification of implementation was done through field observations, workshop and chemical store inspections, worker and community interviews and mill inspections as summarized above.

**3.3.2 Assessment agenda for this Audit**

Date	Location	Main activities
06/11/2017 (Monday)	SWP Meeting Room	08.00 – 09.00: Opening meeting (All Auditor) <ul style="list-style-type: none"> <li>• Introduction by team leader</li> <li>• Presentation by respective managers</li> </ul>
	SWP POM (All Auditor)	09.00 – 17.00: Document review Mill (All Auditor) <ul style="list-style-type: none"> <li>• Document review [EIA, SIA, CIP, Business Plan]</li> <li>• Complaint mechanism / Request &amp; respond</li> </ul> 11.30 – 17.00: Document review (Lead Auditor) Supply Chain Certification Assessment of the POM (RSPO SCCS) <ul style="list-style-type: none"> <li>• Demonstration of legal entity</li> <li>• Roles and responsibility</li> <li>• Procedures/manual/SOP</li> <li>• Record of purchase – RSPO certified product</li> <li>• Record of sales– RSPO certified product</li> <li>• RSPO logo &amp; claims</li> </ul> Time bound plan for other management units and Partial Certification Requirements (Lead Auditor) Site verification <ul style="list-style-type: none"> <li>• Mill inspection</li> <li>• Workshops</li> <li>• Stores</li> <li>• POM application</li> <li>• Safety and Health / PPE / Signage</li> <li>• Waste Management / Environment</li> <li>• Workers interview</li> </ul>
07/11/2017 (Tuesday)	SWP Estate	08.00 – 17.00: Document review (All Auditor) <ul style="list-style-type: none"> <li>• Document review [EIA, SIA, CIP, Business Plan]</li> <li>• Complaint mechanism / Request &amp; respond</li> <li>• Best agricultural practices</li> <li>• Safety and Health</li> </ul> Site verification <ul style="list-style-type: none"> <li>• Best agricultural practices</li> <li>• Manuring, Spraying, Harvesting,</li> <li>• HCV / Conservation Area</li> <li>• Legal compliance / boundary</li> <li>• Chemical / Pesticide / Fertilizer Stores</li> <li>• Workers interview</li> <li>• Worker's facilities (housing, pay, etc)</li> </ul>

	SWP Meeting Room	10.00- 11.00 Stakeholder Consultation (Ryanza)
08/11/2017 (Wednesday)	SWP Meeting Room	08.00 – 15.00: Document review for Estate and mill (Ryan, Ashikin) (Additional field visits and meetings with managers as necessary)
	SWP Refinery	08.00 – 15.00 (Audit SWP Refinery – Furqon) IP, SG, MB Supply Chain Model and documented procedure, Purchasing and goods in, Outsourcing activities (if any), Sales and goods out. Registration of transaction, Training and Record keeping. Conversion factors and claims, Complaints, Management review Modular requirements (Supply Chain requirements, processing, continuous accounting system, fixed inventory periods, conversion ratios, yield schemes)
	SWP Meeting Room	15.00 – 16.00: Preparation for closing meeting RSPO P&C SWP Additional field visits and meetings with managers as necessary 16.00 – 17.00 : Closing meeting RSPO P&C SWP <ul style="list-style-type: none"> <li>• Presentation of findings by the audit team</li> <li>• NC closure dateline (if any)</li> <li>• Questions and answers</li> <li>• Final summary by team leader</li> </ul> End of assessment RSPO P&C

## PART 4 ASSESSMENT FINDINGS

### 4.1 Lead Assessor's Summary and Recommendation for Certification

The mill and supply base visited (as per the above Tables 1.5 and 1.7.1) and were assessed at field, office, facilities, stores and a document review was carried out in accordance to the RSPO principles and criteria. Specific evidence was recorded for mill and estate. Interviews with Estate Managers, Mill Manager, members of workers union and committee took place in both formal and informal environments and worker interviews were conducted at the supply base and the mill. The management is highly committed with the RSPO system by adopting to continuous improvement programs.

There was no complaint or feedback received during the audit or during the field assessment when interviewing with the external stakeholders. The management continually monitoring the established KPI / objectives that significantly rules the achievement of company's corporate policy on RSPO. The mill is fully verified for RSPO SCCS system verification in compliance with all SCCS requirements except for some additional requirements in RSPO SCCS 2014.

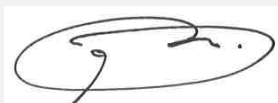
#### Summary of Non-Conformance and Current Status

One major and two minor non conformities has been raised to this complex. This complex also got one observation. The management of PT Steelindo Wahana Perkasa Complex already send the evidence to close this major NC. Lead Auditor already checked the evidence and major non-conformity for this complex was closed. 2 Minor non conformities that issued to this complex to be verified during next surveillance audit. See PART 5 below.

It is therefore the recommendation of the lead assessor that:

- A certificate of compliance is maintained.

Signed:



Name: **Ahmad Furqon**

Date: 09<sup>th</sup> December 2017

#### 4.2 Summary of the findings by Principles and Criteria

- Over the 5 year period of the life of the certificate, there will be 4 annual surveillance audits
- Identified Non-Conformities and noteworthy Positive and Negative Observations.
- The RSPO require that this report contain findings by each principle and some example criteria. Please see table below.

#### Principle 1: Commitment to Transparency

Criterion by Audit	Summary	
ASA 3	1.1	<p>The company has all the copies of requests &amp; responses which are more to internal request and local authority bodies. Such records are kept and available for viewing. Requests made by stakeholder were responded to and all these are well documented. Adequate information available for confidential information that being listed as publicly available. The company is in full compliance to Principal 1 for this complex.</p>
ASA 3	1.1	<p>The information regarding environment issue, social, and laws which related to ISPO/RSPO based on master list document is publicly available. Information request can be delivered via letter/email/fax or via phone/verbal. This document also stated that information request must responded in 15 days period. All information request and communication with stakeholders are recorded in the logbook managed by Humas and Sustainability Department (both mill and estate). SOP for information and response and record are available. Master list of publicly documents : “Sustainable Document”, “Dokumen Keselamatan dan Kesehatan Kerja (K3)”, and “Dokumen Administrasi” latest updated on 29 August 2017. The Manager also must do the follow up on the request for at least maximum on 15 days. For any delay, the company shall inform the reason to the stakeholders.</p> <p>Following sample as below,</p> <ul style="list-style-type: none"> <li>- Letter from “<i>Dinas Pertanian dan Pangan</i>”, no. 525/518/DPP.BT/VI/2017, dated 13 June 2017. Asking for “<i>data perkebunan plasma dan kemitraan</i>”. Follow up was done on 25 July 2017, based on letter no. 44/SWP/SUST/VII/2017, dated 25 July 2017.</li> </ul> <p>Receipt note from related stakeholder dated 25 July 2017 were also provided. Based on explanation from Ms. Atika, she just receive the report on 25 July 2017, so no reason for delay sent to related stakeholders.</p> <p>The company also disseminate the information by socialization regarding RSPO Principles to the stakeholders. All communication, consultation and socialization must be recorded in Stakeholder socialization logbook and management will conduct stakeholder consultation annually. SOP for communication, consultation, and socialization for stakeholders and stakeholder meeting minute record is available.</p>
ASA 3	1.2	<p>The master list of publicly document is available. Sighted in “Sustainable Document”, “Dokumen Keselamatan dan Kesehatan Kerja (K3)”, and “Dokumen Administrasi” latest updated on 29 August 2017. The publicly available documents are all environment issues, social and laws regarding RSPO/ISPO standard implementation that covers land titles/user rights; legal permits, OSH document (policy, SOP, OHS organization, accident registration, risk assessment, training, PPE, etc.), waste management, all sustainability SOPs, public summary of external and internal audits, consultation and communication logbook, complaints and grievances report.</p> <p>Ms. Atika was the person that ensure that up to date monitoring records are available as applicable. Sighted internal audit result for RSPO and the action plan dated 8 September 2017 by Ms. Atika. It was observed the monitoring</p>

		report related to compliance dated October 2017. For example, <ul style="list-style-type: none"> <li>- RKL/RPL report (environmental): Triwulan III (Semester 2) 2017</li> <li>- Medical checkup (health) records, dated on 18 September 2017</li> </ul>
ASA 3	1.3	<p>The policy includes:</p> <ul style="list-style-type: none"> <li>➤ Business integrity – the group is obliged to do business honestly with good ethic and obey all related regulations.</li> <li>➤ The delivery of secret information – the group has to provide a facility to all personnel who report the secret information (prohibited activities).</li> <li>➤ Deforestation prohibition</li> <li>➤ Human rights policy</li> <li>➤ Protecting peatland ecosystem</li> <li>➤ Support socio-economic of local community</li> <li>➤ Facilitate farmers to join the production chain.</li> </ul> <p>The policy is available in local language (Bahasa Indonesia), which is easy enough to be understood. Awareness trainings sighted for all operating units in SWP POM Complex. During field visit (mill and estates), auditors also check and interview with workers. All workers understood and answered to auditors very well.</p>
<b>Principle 2: Compliance with Applicable Laws and Regulations</b>		
Criterion by Audit	Summary	The mill and estates have demonstrated compliance to all applicable local, national and international laws. Legal ownership of land and its land use is clearly demonstrated through the respective land titles. Boundaries have been clearly demarcated. There have been no land disputes or claims involving the mill and estate. The company is in full compliance to Principal 2 for this complex.
ASA 3	2.1	The mill has an updated legal list on 29 August 2017 for workers regulation, steam regulation, location permit, etc. The company has the evidence of compliance such as land deed (Akta Tanah) is available no.164 date 18/01/2010 by Notaris Miryany Usman, SH. Seen the Industrial license is also available. Izin Usaha Tetap (IUT) no. 43/Industri/2000 by Badan Koordinasi Penanaman Modal Republik Indonesia. SOP for laws and regulations compliance is available (SOP 2. Kepatuhan Terhadap Peraturan dan UU yang berlaku), dated 01/07/2014. The updated regulations is from Head Office in Jakarta (Victor) – the information is down to each region (ex: regional Belitung (H.O PT SWP)) -- down to Estate Manager, POM/Refinery/KCP-Biogas Manager/Sustainability Coordinator, PT PS, PT AMA – down to sustainability coordinator in K.Barat, K. Timur, K. Selatan, K.Utara. SOP for internal audit is available (SOP 44. Pelaksanaan Internal Audit Sustainability) and the internal audit report is available.
ASA 3	2.2	<p>For mill, Land deed (Akta Tanah) is available no.164 date 18/01/2010 by Notaris Miryany Usman, SH. Izin Usaha Tetap (IUT) no. 43/Industri/2000 by Badan Koordinasi Penanaman Modal Republik Indonesia. SOP for boundary stone monitoring (SOP 46. Pemantauan Patok BPN), date 1/07/2014. In this SOP, it is said that boundary monitoring is done annually by 3 competent people.</p> <p>Sighted Checklist Boundary Monitoring. For Kebun Selatan, has been conducted on 11-07-17, the result is all boundary point available, also supported with documentation records. For Kebun Utara, on dated 4 July 2017, with result is all boundary point available. It was observed that the monitoring was done every 6 months. According to interview with sustainability division, there is no land dispute in PT SWP until now.</p>

		SOP/Mechanism for land acquisition is available (SOP 27. Perolehan lahan untuk penanaman Kelapa Sawit), dated 1/07/2014.																																														
ASA 3	2.3	PT SWP does have SOP for land conflict resolution, the SOP covers FPIC mechanism (saling tukar informasi). HCV maps are available and according to Sustainability Division, there's no land compensation in these few years. SOP/Mechanism for land acquisition is available (SOP 27. Perolehan lahan untuk penanaman Kelapa Sawit), dated 1st July 2014. This SOP explains about the mechanism flows in acquainting the land. In the mill, all SIA, EIA, and other reports were available in Bahasa Indonesia which is easy to be understood. Some of SOPs especially related to information dissemination has a flow chart to describe how the flow of information distribution is. Ex: PT SWP has an SOP for laws and regulation compliance is available (SOP 2, 1st July 2014). The SOP also explains the mechanism of updated laws/regulations information delivery.																																														
<b>Principle 3: Commitment to Long-Term Economic and Financial Viability</b>																																																
<b>Criterion by Audit</b>	<b>Summary</b>	<b>Business plan 3 years projections for the mill and estate that details revenue and costs are available. There is no replanting programme for the estate for the next five years. The company is in full compliance to Principal 3 for this complex.</b>																																														
ASA 3	3.1	<p>Bussines management plan (provided from year 2017 - 2021) is available during the audit. Sighted document "2016/2017 Estimates" by each division, field name and hectares, clone, immature hectares, yield per hectares and estimated FFB production. This document includes summary of expenditure, capital expenditure, indirect cost, mature and immature area statement, estimate vehicle &amp; allocation and relevant appendices. Economic Indicators For PT SWP for 5 year projection is available in place dated January 2017 shown as below:</p> <table border="1" data-bbox="655 1173 1347 1328"> <thead> <tr> <th>Indicators</th> <th>2016-2017</th> <th>2017-2018</th> <th>2018-2019</th> <th>2019-2020</th> <th>2020 - 2021</th> </tr> </thead> <tbody> <tr> <td>% OER</td> <td>21.75</td> <td>21.1</td> <td>20.68</td> <td>20.26</td> <td>19.86</td> </tr> <tr> <td>% KER</td> <td>5.5</td> <td>5.5</td> <td>5.5</td> <td>5.5</td> <td>5.5</td> </tr> </tbody> </table> <table border="1" data-bbox="635 1364 1367 1594"> <thead> <tr> <th>Indicators</th> <th>2016-2017</th> <th>2017-2018</th> <th>2018-2019</th> <th>2019-2020</th> <th>2020-2021</th> </tr> </thead> <tbody> <tr> <td>CPO Production</td> <td>86,031</td> <td>87,623</td> <td>90,164</td> <td>92,778</td> <td>95,469</td> </tr> <tr> <td>PK Production</td> <td>21,775</td> <td>22,843</td> <td>23,985</td> <td>25,184</td> <td>26,443</td> </tr> </tbody> </table> <p>Estate have document Summary "Tahapan Replanting PT SWP". It was sighted 8 phase of replanting that will start on 2018 and end on 2026. The replanting program will be done at north, west, east and south division which will involve 13,351 Ha of land. Tabulated below explained in detail:</p> <table border="1" data-bbox="774 1809 1228 2000"> <thead> <tr> <th>Phase replanting</th> <th>Total Ha involve</th> </tr> </thead> <tbody> <tr> <td>I</td> <td>1789</td> </tr> <tr> <td>II</td> <td>1814</td> </tr> <tr> <td>III</td> <td>1843</td> </tr> <tr> <td>IV</td> <td>1499</td> </tr> </tbody> </table>	Indicators	2016-2017	2017-2018	2018-2019	2019-2020	2020 - 2021	% OER	21.75	21.1	20.68	20.26	19.86	% KER	5.5	5.5	5.5	5.5	5.5	Indicators	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	CPO Production	86,031	87,623	90,164	92,778	95,469	PK Production	21,775	22,843	23,985	25,184	26,443	Phase replanting	Total Ha involve	I	1789	II	1814	III	1843	IV	1499
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<b>Principle 4: Use of Appropriate Best Practices by Growers and Millers</b>										
Criterion by Audit	Summary	Mill and estates have applied SOPs and best agricultural practices to ensure its operations are conducted in safe, effective and environmentally friendly manner. IPM implemented in the estate and the uses of chemicals are in accordance with the regulations. There is a comprehensive OSH policy implemented throughout the mill and estate. Trainings are being planned and carried out by the mill and estate management to educate and create awareness among their workforce on best procedures and practices								
ASA 3	4.1	<p>Procedure for mills have been documented. The SOP for mills is evidence in “PT Steelindo Wahana Perkasa Prosedur Operasi Baku untuk Pabrik Kelapa Sawit” revision dated on 01/10/2015. Seen there are 19 SOPs [entirely in Bahasa Indonesia] that covers all operations in the mill such <i>SOP 1: Stasiun Jembatan Timbangan’ issued on 01/09/2012, “SOP untuk CPO transfer to refinery”, issued on 01/10/2015, etc.</i> There is evidence that SOPs are implemented and understood by workers in every station in the mill.</p> <p>An internal control activity has been conducted by Assistant Mill Managers and Mill Manager. An implementation audit has been carried out every month covering implementation of all the SOPs. Mill Advisor (MA) visit are conducted twice a year to evaluate the mill performance. Procedure to address non-compliance and corrective action for continuous improvement is evident in Mill Progress Reports. Monitoring of the operations procedures is done through annual internal audit. Verified ‘Rencana Tindak Hasil Audit Internal RSPO’ issued for PT SWP dated 08/09/2017. It has been conducted by Ms. Atika. Several findings is highlighted in checking of implemented procedures.</p> <p>In total, there are 48 SOPs covers all operations in the estate such as SOP Permintaan Informasi dan Tanggapan, SOP Kepatuhan Terhadap Peraturan dan Undang-undang Yang Berlaku, etc. There is evidence that SOPs are implemented and understood by workers in every station in the estate (e.g.: Land Clearing, Nursery, Manuring, Pruning, Harvesting and etc.). SOP Training for all works has been conducted annually. The SOPs are made available through Estate management, Document Controller at the point of use. At this moment, all point of use is maintained at Buku Sosialisasi dan Informasi.</p>								
ASA 3	4.2	<p>SOPs for Good Agricultural Practices in managing soil fertility are available in Sustainability Standard Operating Procedures (1/07/2014). SOP 12 Pengelolaan Atas Kesuburan Tanah Yang Optimal Untuk Produktivitas dated on 01/07/2014. In SWP Estate, estate conducted implementation to maintain soil fertility as follow:</p> <ul style="list-style-type: none"> <li>• EFB mulching</li> </ul>								

		<ul style="list-style-type: none"> <li>Application of fertilizer and pesticide based on agronomist recommendation</li> </ul> <p>Sighted in 'Oil Palm Manuring Recommendation PT Steelindo Wahana Perkasa Kebun Selatan/Utara/Timur Barat 2016/2017' by appointed agronomist. Agronomist had already outlined respected areas to be applied in estate operational activities.</p> <p>Records of fertilizer input is available in 'Costing Book Manuring Bentaian' updated by staff as verified latest application is completed at Block F/07 for NK starting 21/10/2017 until 26/10/2017. It was observed that total of 708 bags at 132 Ha of estate. EFB application is updated latest on September 2017 with grand total of 138.12 Ha applied.</p> <p>Agronomist had done periodical leaf, soil and visual analysis annually and had come out with leaf/rachis/soil nutrient status as follow:</p> <ul style="list-style-type: none"> <li>PT AAR PT SWP Foliar analysis result both for major (% on DM) and minor elements</li> <li>PT AAR PT SWP Soil Analysis Result for mechanical analysis, exchangeable cation etc.</li> <li>PT AAR PT SWP Estimated Soil Moisture Deficits And Surplus</li> <li>PT AAR PT SWP Field Assessment Notes for 2016/2017</li> <li>Summary of Canopy size/canopy vigour/palm circle/interrow/bunch set assessments 2016/2017</li> </ul>
ASA 3	4.3	<p>In SWP Estate, sighted the SOP 12 dated on 01/07/2014 for "Pengelolaan Atas Kesuburan Tanah Yang Optimal Untuk Produktivitas". Soil map latest update on 10/08/2015. There are 9 type of Soil (such as Alluvium, Sandstone and Marine Alluvium) in the estate area. Map geo-referenced and of appropriate scale 1: 100,000. There is not fragile soil composition in estate areal.</p> <p>Management strategy for plantings on slopes is in place. The procedure for planting on slopes is clearly explained in SOP 31- Pembukaan Lahan (Land Clearing) dated on 01/07/2014 ". There is no slopes area which is exceeding the 15 degrees' slopes. The management strategy includes planting on steep areas of more than 40, policy of planting on slopes is available in Pembukaan Lahan (Land Clearing) dated on 01/07/2014 and SOPs to minimize soil erosion is compiled under Sustainability Standard Operating Procedures. An internal control activity has been conducted by Assistant Estate Managers and Estate Manager. An implementation audit has been carried out every month covering implementation of all the SOPs.</p> <p>In SWP Estate, the road maintenance program for 2016/17 is available for all field areas and line sites. Sighted the SOP 11.0 dated on 01/07/2014 for "Langkah Perawatan dan Pembaikan Jalan". Seen the road maintenance records for Road Grading, surfacing with crusher run, road and upkeep grading and etc. Sighted the "Payment" 2016-2017 that being evidence for road maintenance was carried out as per plan.</p>
ASA 3	4.4	<p>In mill sighted the water management plan with identified actions are in place as available in Rencana Pengelolaan Air. Latest on January 2017. The plan does include identification of water sources – Air Takungan (about 1km from the mill). Seen records of efficient use of water [Mill: 1200MT/day and</p>

		<p>Domestic: 450MT/day]. The identified actions in the plan been implemented as evident in Water Test Result.</p> <p>The mill have a license for treatment, discharge or land application of mill effluent as evident in Perpanjangan Izin Pemanfaatan Air Limbah Pada Tanah Perkebunan PT SWP Di Desa Senyubuk Kecamatan Kelapa Kampit Kabupaten Belitung Timur Bupati Belitung Timur (No.: 503/002/PAL/BPMPT/2015). The mill is in compliant with all the requirements of the license. There are maps identifying water courses in the estate is evident in Estate Map. Estate Map for SWP evidences that one river or watercourses available -Sungai Degong. Site inspection at Division Bentaian evidence that watercourses along Sungai Degong are well maintained. The riparian and buffer zone are maintained and restored in the plantation area.</p> <p>The company has established a policy to protect buffer zone in SOP 10 "Identifikasi dan Pemeliharaan Daerah dan Sempadan Sungai". The SOP covers Buffer Zone and Riparian Identification, Border area, Planting of Forest tree, monitoring and maintenance. The procedure has established, marking need to be done at interval 50 metres. Riparian zone was established and explained in the Riparian zone map. It was sighted in Procedure, section "Pemeliharaan dan Pemantauan", the prohibition of chemical activity, both spraying and fertilizing, The spraying and fertilizing operator should be trained regarding riparian zone procedure. The policy and SOP has been implemented as evident during site visit to Division Bentaian. Checklist riparian zone is available as sighted in "HCV Checklist Lembong Hangat Dan Alirannya" last monitored on 17/10/2017 where signboard, buffer zone area and marking, spraying/fertilizing, burning, water condition, buffer zone condition. Water courses and ground water is periodically check on monthly basis. The program for maintaining hot spring area is outlined in 'Rencana Pengelolaan HCV Kebun Selatan Tahun 2017' updated on annual basis. Riparian zone checklist is done weekly latest on 24/10/2017 by Ms. Linda to check on if there is any spraying activity done, fertilizing, signboard, water pollution, etc.</p> <p>Record of mill water use per ton FFB is available as below:</p> <table border="1" data-bbox="778 1473 1225 1937"> <thead> <tr> <th>Month</th> <th>MT water/MT FFB</th> </tr> </thead> <tbody> <tr> <td>October 2017</td> <td>0.64</td> </tr> <tr> <td>September 2017</td> <td>0.71</td> </tr> <tr> <td>August 2017</td> <td>0.56</td> </tr> <tr> <td>July 2017</td> <td>0.4</td> </tr> <tr> <td>June 2017</td> <td>0.62</td> </tr> <tr> <td>May 2017</td> <td>0.62</td> </tr> <tr> <td>April 2017</td> <td>0.68</td> </tr> <tr> <td>March 2017</td> <td>0.97</td> </tr> <tr> <td>February 2017</td> <td>0.75</td> </tr> <tr> <td>Januari 2017</td> <td>0.64</td> </tr> </tbody> </table>	Month	MT water/MT FFB	October 2017	0.64	September 2017	0.71	August 2017	0.56	July 2017	0.4	June 2017	0.62	May 2017	0.62	April 2017	0.68	March 2017	0.97	February 2017	0.75	Januari 2017	0.64
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ASA 3	4.5	Estates have implemented Integrated Pest Management plan as sighted in																						



		<p>IPM SOP. Natural approach to manage pest population has been implemented, especially for rat &amp; insects. The implementation of the IPM is done as verified 'Pengendalian Hama Terpadu Kebun Utara/Selatan/Timur/Barat' dated 01/06/2017 for:</p> <ul style="list-style-type: none"> <li>• Census: will done for nettle caterpillar, rhino battle, rat, termite, ganoderma</li> <li>• Beneficial plant: tunera subulata, cassia, antigonon</li> <li>• Barn owl census</li> <li>• Monitoring of pesticide usage</li> <li>• Training: IPM training, spraying training</li> </ul> <p>Estate management provides adequate training for those involved in IPM implementation. Sighted IPM training records for Estate has conducted training titled "Pelatihan Pengendalian Hama terpadu" on 24 August 2017.</p>
ASA 3	4.6	<p>In the mill, seen SOP-5 for Keamanan Penggunaan dan Penyimpanan Bahan Kimia termasuk Hdrokarbon, 01/07/2014. During site visit, storage of chemical is in appreciating manners, well ventilated. PT Primanru Jaya. Date 28 February 2017 (5 years contract). All empty containers are disposed by licence collector. There is evidence that mill conducted the training for waste management to their workers/staffs. "Pelatihan Manajemen Limbah B3". The evidence that implementation of proper ways is on Berita Acara Peninjauan Lapangan Pengambilan Limbah B3 (No: 660/076/BAPL/BLHD-III/X/2015. Seen the license for SW collector and record the in/out of SW.</p> <p>Estates have maintained training records for those handling pesticide. The company has established chemical/pesticide handling SOP 'Sustainability Standard Operating Procedures (SOP) SOP 5 "Keamanan Penggunaan dan Penyimpanan dari Bahan Kimia termasuk Hidrokarbon" second revisi dated on 19/07/2017. Sighted estates training are conducted in Bahasa Indonesia and as per the interviews done during field visits with workers whereby they understood the training which they have attended. The operators were also trained before placing them for spraying job and evaluation related to any miss-act would be given on job training by the group leader (Mandore). The workers have understood and aware of the chemicals risk and able to explain its related risk. Verified training record as below,</p> <ul style="list-style-type: none"> <li>• 'Pelatihan Pengendalian Hama Terpadu' dated 24/08/2017 given by Mr. Andy to 4 workers.</li> <li>• 'Pelatihan SaOP Semprot' dated 09/05/2017 given by Mr. Andy Indarto to 6 workers</li> <li>• 'Pelatihan memupuk' dated 16/09/2017 to 10 manuring workers.</li> </ul> <p>Safety equipment and adequate safety wears are provided by the estate management for its workers. During field visit, sighted sprayers are wearing proper PPE and MSDS is readily available. Interview with sprayers indicated that PPE are provided by the estate management without any charges and damaged PPE are replaced without any condition imposed.</p> <p>Guidance for storage of pesticides is described in 'Pedoman Teknis Pelaksanaan Housekeeping, section Pesticide Storage'. During site visit noticed that pesticides are stored in proper manner. Empty containers, all</p>

		<p>expesticide containers are stored at Schedule waste store (Limbah B3) subsequently picked by external party.</p> <p>Sighted proper disposal of waste material in the Mill. The waste materials such as Solid, Boiler ash were applied in field. Sighted training record for mill on 'Operasional &amp; Limbah B3' and attendance list. As for estates, hazardous wastes are disposal by licensed contractor PT. Pengolahan Limbah Industri Bekasi. An agreement in term of picking mechanism and payment has been declared.</p> <p>Training for pesticide handling has been conducted on 24 August 2017 and 9 May 2017, which was attended by 11 participant. Material of training explained regarding safety and chemical preparation and hazardous waste management.</p> <p>In Estate, sighted list of workers who are handling pesticides titled 'Daftar Tenaga Kerja. Sighted annual medical surveillance for both estates titled 'Hasil Medical Check-up' conducted at Estate whereby Medical Agent was invited by Focus Clinical Laboratory to do the medical checkup on the workers. Beside annual medical surveillance checkup, Estates also conduct monthly health check covering general body condition and any symptoms of illness as sighted in 'Form Medical Check-up Bulanan'.</p> <p>Estates prevent pregnant &amp; breast-feeding woman from handling pesticide, as in line with 'POD – Perlindungan Reproduksi Manusia' no. MMPOD/01.01/1.3.5. Sighted list of female workers handling pesticide is available. In estate , there is no pregnant women sprayer as per this audit. Where in estate female sprayers.</p>
ASA 3	4.7	<p>The company has established health &amp; safety plan which includes health and safety policy, OSH procedures, HIRA, safety equipment inventory, medical check-up, safety meeting, safety training, etc. To enhance workers understanding on safety risks, HIRA are displayed at all prominent places of the mill and estates. Company's Health and Safety policy which governs mill and estates was signed and approved by Mr. Rajoo Sinnapan (Agricultural Director) titled 'PT Steelindo Wahana Perkasa Kebijakan Keselamatan Dan Kesehatan Kerja.'</p> <p>Mill and estates have conducted and documented safety and health risk assessment and have established mitigation measures for its operations and reviewed annually for its effectiveness. OSH plan is outlined as verified in, 'Program Pelatihan K3 di PT SWP Tahun 2017' last updated on 02/11/2017 to conduct training such as ERP, OSH committee, 1<sup>st</sup> aid, fire burning etc.</p> <p>Meeting between OSH responsible person with workers has been conducted every month (Meeting Bulanan P2K3 on 02.10.2017).</p> <p>In SWP Estate, health and safety policy is has been approved by their top management on 09/07/2013. Health and safety plan for the estate is in place as evident in Program Pelatihan 2017-2018. The plan has included in (Laporan Pengelolaan dan Pemantauan Lingkungan Triwulan II (Semester 1) and the effectiveness of the plan is monitored by interviewed the workers and staffs.</p> <p>Health and safety plan made publicly available for all workers. The plan has</p>

		<p>allocated a section to put remarks (Action Plan) in case the targets are not achieved. All workers involved in the operation are appropriately trained in safe working practices as available in Rencana Program Pelatihan 2017. Examples of safety trainings conducted were harvesting, spraying and road safety for motorcyclist.</p> <p>All training has been conducted by competent personnel. Adequate and appropriate protective equipment available has been provided to all workers at the place of work to cover all potentially hazardous operations and machine operations as listed in the Borang HIRADC. There is evidence that all workers are provided with medical care and covered by accident insurance by the company. All workers are covered under BPJS.</p> <p>The mill and estate workers are covered by Government-managed Insurance, BPJS Kesehatan &amp; Ketenagakerjaan. Appropriate medical treatment has been given to all employees met with accident or illness as sighted in 'Laporan Pembayaran BPJS' which showing total bill paid for all employees. There is no contract workers employed in any of the operating units.</p>
ASA 3	4.8	<p>The mill has established an annual training plan for relevant personnel as evident in Rencana Program Pelatihan Untuk Executive, Staff dan Karyawan 2017. For estate, training program is covering aspect of OSH, environment, workers, social, RSPO/ISPO and ISCC. Workers will be briefed based on KLK (GAP), RSPO, SaOP (OSH) and socialization. Sighted in training record of 'Pelatihan K3 Umum' dated 16/08/2017, it was attended by 38 workers.</p> <p>The mill has established a formal training programme that covers all aspects of the RSPO Principles and Criteria. The plan did include training such as RSPO Training and Gender Committee. Verified training record as below,</p> <ul style="list-style-type: none"> <li>• 'Pelatihan Pengendalian Hama Terpadu' dated 24/08/2017 given by Mr. Andy to 4 workers.</li> <li>• 'Pelatihan SaOP Semprot' dated 09/05/2017 given by Mr. Andy Indarto to 6 workers</li> <li>• 'Pelatihan memupuk' dated 16/09/2017 to 10 manuring workers.</li> </ul>
<b>Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity</b>		
Criterion by Audit	Summary	Environmental Impact Assessment has been carried out by the mill and estates. A comprehensive identification of all waste has been recorded and disposal of scheduled waste has been carried out by an approved and registered collector. The company is in full compliance to Principal 5 for this complex.
ASA 3	5.1	<p>SWP Palm Oil Mill has conducted EIA which is known as Analisis Dampak Lingkungan (ANDAL) in year 1997 in line with Indonesian legal requirement. A review of EIA was done for the mill operation in year 2010 upon increase of mill capacity 80 Mt/hr to 120 Mt/hr. Sighted EIA updated assessment report titled "Dokumen Evaluasi Lingkungan Hidup Peningkatan Kapasitas Pabrik Pengolahan Kelapa Sawit" dated October 2010 conducted by Ir. Kharul Anam a private environmental consultant who has certificate of competency #000130/SKPALSK-INTAKINDO/1/2010.</p> <p>The EIA assessment report has recommended environmental management plan in Table 4-1 (Matrix Upaya Pengelolaan Lingkungan Pembangunan Kebun dan Pabrik Kelapa Sawit – Pt. Steelindo Wahana Perkasa) under BAB.IV Rencana Pengelolaan dan Pemantauan Lingkungan. In accordance with</p>

		<p>Indonesian environmental law (Menteri Lingkungan Hidup No. 45, tahun 2005) under the orders of the environmental minister, environmental monitoring plan (RPL) and environmental management plan (RKL) are done twice in a year</p> <p>Sighted environmental monitoring report (RPL) for the 1st Cemester of 2017 (July 2017) which reports the results of the Mill's monitoring activities (air quality, noise, water quality) and management plan to reduce pollution and impact to environment. There is no change to mill activities since last audit. Person responsible for action plans are stated in the company SOP.</p> <p>The control measures stated in the environmental management plan are reviewed twice year during environmental monitoring plan (RPL) and environmental management plan (RKL) compilation by Company's Sustainability staff Mr Adethya. Last review was done on July 2017. Effectiveness of mitigation measures are also monitored during RSPO internal audits which was conducted on 08/09/2017 by company's internal auditor Ms. Attika.</p> <p>In SWP Estate, seen the management has conducted EIA which is known as Analysis Dampak Lingkungan (ANDAL) in year 1997 in line with Indonesian legal requirement. The environmental impact assessment (ANDAL) has covered 14065.12 hectare of land including plantation area, office, workers quarters, agriculture road, etc. The results of ANDAL are then followed-up regularly every 6 months, and are reported to the Environmental Agency of Belitung Timur Regency in the form of environmental monitoring plan (RPL) and environmental management plan (RKL). The environmental monitoring and management plan (RPL &amp; RKL) are being reviewed once every 6 months and report of monitoring activity results are submitted to The Environmental Agency of Belitung Timur Regency. Latest RPL &amp; RKL report is available, and has been approved by the aforementioned authority.</p>
ASA 3	5.2	<p>In SWP Estate, seen the HCV assessment was conducted in September 2012 by a private environmental consulting company Aksenta. The company has established SOP 15 titled "Identifikasi Dan Pengelolaan HCV, Flora &amp; Fauna dated 01 July 2014. The HCV report has identified HCV area of 520,4 hectares which covers 3,7 % of the total estate land area. The assessment has covered HCV 1 to HCV 6 and the identified HCVs as follows:</p> <ul style="list-style-type: none"> <li>• HCV 1.3 Buaya Ikan (Tomistoma schlegelli) and Buaya Muara (Crocodylus Porosus)</li> <li>• HCV 1.4 Kura-kura (Cuora amboinensis) and labi-labi (Amyda cartilaginea)</li> <li>• HCV 4.1 Water sources from Sungai Rengas, lembung Yatuh, Sungai Tinggan, Sungai Raya, Air Netah and Lembung Hangat.</li> <li>• HCV 4.2 DAS Buding, DAS Manggar, DAS Air Kelik, &amp; DAS Tj. Asam</li> <li>• HCV 4.3 Lembong Nyatoh (Water Course)</li> <li>• HCV 5 Kebun Campuran milik Ibu Sija</li> <li>• HCV 6 Makam Datuk Sri Paji</li> </ul> <p>The estate has established HCV Management Plan for year 2017, prepared by the Humas &amp; Manager. The plan has objective, baseline, activities, target PIC and status. Sighted HCV and RTE training and attendance records for providing HCV training to 30 employees on 25/08/2017 by Mr. Andy Indarto. Sighted warning sign boards prohibiting manuring, spraying, fishing and hunting erected riparian zone.</p>

		The company has established SOP-15 titled "Identifikasi Dan Pengelolaan HCV, Flora & Fauna dated 01/07/2014. HCV areas are being monitored regularly, the results are then documented and reported as feedback to the management. Anyone found guilty of violating HCV conservation rules are to be taken into custody by the Police. There is no HCV area conflicting with areas with local community's rights within the plantation.																																							
ASA 3	5.3	<p>The management has identified all waste generated from the mill operations in document titled "Identifikasi Sumber-sumber Limbah dan Rencana Operasi untuk Mengurangi Polusi Lingkungan-Pabrik". The document been updated on 08/07/2017. Examples of waste and source of pollution identified:</p> <ul style="list-style-type: none"> <li>• Oils and lubricants from vehicles and machineries</li> <li>• Used batteries from vehicles and generators</li> <li>• Fibers from palm oil processing</li> </ul> <p>Smokes and dusts from palm oil processing The mill is in cooperation with PT. Primanru Jaya, a private company operating as licensed hazardous waste handler (official permit issued by Indonesian Environmental Ministry, number SK.1/MenLHK/Setjen/PLB3/1/2017 tentang Perpanjangan izin pengelolaan limbah bahan berbahaya dan beracun" issued date on 09 November 2017. Both companies are bound by a cooperational contract which will be valid until 19/05/2018. The record shows that the latest waste disposed by the estate in 20 October 2017 by PT Primanru Jaya, which contain used oil 2,367 mt, used battery 0,105 mt, used oil filter 0,162 mt.</p>																																							
ASA 3	5.4	<p>SWP POM uses two power sources: a generator fuelled by fossil fuels, and a boiler fuelled by palm oil kernel shells. The "fuells" usage of the respective power sources are being monitored and compared monthly to evaluate the usage ratio between fossil fuels and renewable power source. SWP POM uses two power sources: a generator fuelled by fossil fuels, and a boiler fuelled by palm oil kernel shells. The "fuells" usage of the respective power sources are being monitored and compared monthly to evaluate the usage ratio between fossil fuels and renewable power source. While the generator only powers the mill facility, the mill is sharing the electricity which generated from the boiler to the estate. In addition, the estate's electricity is also being supplied by the national electricity company (PLN).</p> <p>Sightedd in the power generation &amp; usage for SWP POM. Power generated from 2 categories which is Turbine and Genset. Sampling records 2017 as follow,</p> <table border="1"> <thead> <tr> <th>Month</th> <th>kwh</th> <th>Kwh / mt CPO</th> </tr> </thead> <tbody> <tr> <td>Oct 16</td> <td>105,503</td> <td>0.9</td> </tr> <tr> <td>Nov 16</td> <td>103,085</td> <td>0.9</td> </tr> <tr> <td>Dec 16</td> <td>96,286</td> <td>0.9</td> </tr> <tr> <td>Jan 17</td> <td>96,806</td> <td>0.89</td> </tr> <tr> <td>Feb 17</td> <td>79,227</td> <td>0.88</td> </tr> <tr> <td>Mar 17</td> <td>101,942</td> <td>0.85</td> </tr> <tr> <td>Apr 17</td> <td>117,010</td> <td>0.9</td> </tr> <tr> <td>Mei 17</td> <td>123,846</td> <td>0.9</td> </tr> <tr> <td>Jun 17</td> <td>123,212</td> <td>0.87</td> </tr> <tr> <td>Jul 17</td> <td>117,684</td> <td>0.89</td> </tr> <tr> <td>Aug 17</td> <td>111,539</td> <td>0.84</td> </tr> <tr> <td>Sept 17</td> <td>106,112</td> <td>0.83</td> </tr> </tbody> </table>	Month	kwh	Kwh / mt CPO	Oct 16	105,503	0.9	Nov 16	103,085	0.9	Dec 16	96,286	0.9	Jan 17	96,806	0.89	Feb 17	79,227	0.88	Mar 17	101,942	0.85	Apr 17	117,010	0.9	Mei 17	123,846	0.9	Jun 17	123,212	0.87	Jul 17	117,684	0.89	Aug 17	111,539	0.84	Sept 17	106,112	0.83
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ASA 3	5.5	No land preparation and/or replanting activity occurred since last audit																																							
ASA 3	5.6	Mill's polluting activities have been assessed during environmental impact																																							

		<p>assessment which is known as Analisis Dampak Lingkungan (ANDAL) in year 1997 in line with Indonesian legal requirement. The mill has conducted reassessment of its processes upon increasing of its operation capacity from 60 Mt to 120 Mt in year 2010. The following are some of pollution sources which has been identified in the assessment report: ☐</p> <ul style="list-style-type: none"> <li>• Boiler operation</li> <li>• Noise and air pollution</li> <li>• Mills effluent</li> <li>• Water pollution</li> <li>• Genset operation</li> </ul> <p>The mill has identified and calculated GHG emission using RSPO PalmGHG calculator. Sighted the “GHG SWP POM Data Template” for year 2017 that consisted of data from by-products, energy consumption, POME disposal, EFB disposal and basic mill data.</p> <p>GHG for the plantation is been calculated by Mr Muriyanto. The calculation was done based on RSPO Palm GHG calculator which was downloaded from RSPO website. Input factors used in the calculation are crop production, planting data, fertilizer and the diesel consumption.</p> <p>The company has established SOP-40 “Mitigasi Gas Rumah Kaca” dated 02/10/2016. The mitigation measures for green house emission includes replanting and manuring, fire prevention, usage of biogas, etc.</p> <p>Mill’s polluting activities are monitored once every 6 months and report of monitoring are submitted to Environmental Agency of Belitung Timur Regency. Mill’s polluting activities have been assessed during environmental impact assessment which is known as Analisis Dampak Lingkungan (ANDAL) in year 1997 in line with Indonesian legal requirement.</p>
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**Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers**

Criterion by Audit	Summary	The mill and estate have conducted the social impact assessment. The relevant policies are in place and are fully implemented across the board. Communication and consultation as well complaints and grievances procedure are well communicated and adhered to. There are evidences of workers not been discriminated against in any way and all are being paid their fair wages.
ASA 3	6.1	<p>SIA has been conducted from 7 – 14 August 2012 for both SWP POM and Estate. The SIA process and findings was documented in a report dated September 2012 by Aksenta (external consultants) in one report as one entity. Observed the report consist of,</p> <ol style="list-style-type: none"> <li>1. Pendahuluan (Introduction)</li> <li>2. Metodologi (Methodology)</li> <li>3. Gambaran Umum Wilayah Kajian (General Description)</li> <li>4. Key stakeholders and social issue</li> <li>5. Social Impact and Risk Analysis</li> <li>6. Social Impat to the local society</li> <li>7. Summary and Recommendation</li> </ol> <p>Also observed the report covering:</p> <ul style="list-style-type: none"> <li>- Negative and Positive Social Impact</li> <li>- Economic aspect</li> <li>- Corporate Social Responsibility Program</li> </ul>

		<ul style="list-style-type: none"> <li>- Long term impact</li> <li>- Land ownership</li> <li>- Health, Safety, and Environment Aspects</li> <li>- Communication</li> </ul> <p>Participatory assessment is based by interview and evidence of photos and name list is attached to Aksenta report. In SWP Estates, the SIA has been carried out in 2013 by Aksenta (external consultant). A documented report covers all potential impact factors including access and use rights, economic, cultural, religious, education, health etc. Aksenta report has documented name list &amp; photos of interviews/visits with employees, local community and stakeholders. SIA mitigation plan indicating objective, indicator, action activities, timeframe, responsibility and status is prepared and monitored.</p> <p>The assessment report has identified positive impacts such as gained access to job opportunities, utilities, economical added value, etc. and negative impact such as degradation of water source, migration of outsider, reduction of source from woods and water, etc. In order to mitigate negative impacts and promote positive ones, SIA management plan outlining key action that company need to implement has been recommended in the report. Since implementation, the management plan is been reviewed and updated by the company annually by Humas department. This management review is conducted together with participation of affected parties. Sighted the latest report of 'Rencana Pengelolaan Sosial dan Pemantauan PT. Steelindo Wahana Perkasa (PT. SWP) : 2016/2017. Management plan is completed with action plan, status and PIC appointed for respective scopes. Based on the report sighted the plan was monitored. It was observed, one of the methodology was by sharing questionnaires. Sighted questioner from Sulistianengsih (Sekretaris Desa Bentaian), dated 23 January 2017. Expecting that the company can give contribution not only donation during religion event (such as Hari Raya), but also give contribution in education.</p>
ASA 3	6.2	<p>A list of stakeholders dated 27 Oktober 2017 is maintained. Total of 123 stakeholders. SOP 'Komunikasi, Konsultasi dan Sosialisasi dengan Stakeholder'– SOP-19 dated 1/Jul/2014 Rev 3. SOP 'Integrasi Sosial' (SOP-23) dated 1/Jul/2014. Evidence was available for 2017 for the socialization of KLK Policies and TBS Pricing.</p> <p>The person responsible for stakeholder communications is : Mr. Bambang Y Sudarsono (Senior Manager Humas), Mr. Hardiansyah (Assistant). The Manager and Assistant have been identified in the procedure for communication and consultation with affected parties. The external stakeholders are aware of the Manager and assistant as contact person based on the various meetings and consultations. Sighted also latest records of stakeholder meeting "<i>Notulen Pertemuan Stakeholder</i>", dated 23 December 2016, the topics regarding Sustainability, HCV, Complaint Procedure, Hotline Damkar.</p>
ASA 3	6.3	<p>Both mill and estate has established the procedure "<i>Penyampaian Pengaduan / Keluhan</i>", version 2, dated on 12 August 2016 .The existence of the system been clearly communicated. For external stakeholders, informed during Stakeholders Consultation. Attendance records available. Sighted Complaint Logbook. For internal stakeholders, the mechanism is clear that grievance can be reported to Mill Manager/Assistant. Also, sighted policy on KLK Sustainability Policy. Logbooks are used to log any external or internal complaint. The outcome is documented in logbooks and acknowledged by</p>

		<p>stakeholder. The SOP is socialized to workers in POM to improve workers understanding regarding how to deliver their complaints/grievances. All complaint and grievance from stakeholders were responded in the time period as stated in the complaint and grievance SOP.</p> <p>Among the requirements outlined in the SOP includes for the management to respond and to take action within 14 days from the date of complaint or grievances received and mandatory to respect and maintain anonymity of complainant. Complaint/grievances received are brought to the attention of respective unit Manager for further action.</p>
ASA 3	6.4	<p>Procedure 'Perolehan Lahan untuk Penanaman Kelapa Sawit' dated 1/Jul/2014 Rev 3 and Procedure 'Penyelesaian Sengketa Lahan' 1/Jul/2014. Procedure is clear with FPIC and involvement of affected parties to discuss on the compensation. No evidence of disputes recorded. Stakeholder consultation confirmed that SWP has not had any land dispute that required compensation. It was observed that there was land dispute in 2017.</p>
ASA 3	6.5	<p>Each employee has a pay slip and acknowledged by employee. The pay slip is consists of basic salary, food allowance (tunjangan beras) and period allowance (tunjangan berkala) and deductions. Deductions are paid for BPJS Kesehatan, BPJS Ketenagakerjaan and Workers' union.</p> <p>The working hours per day is 7 hours/day and 40 hours/week, if workers work more than that, the next hours must be calculated as overtime (this requirement is stated in the PKB). The overtime is calculated as per Government regulation. The PKB was agreed and signed by both parties on 15 September 2017. (valid for 2 years, till 14 September 2019). Sighted collective labor agreement (Perjanjian Kerja Bersama/PKB) between PT. SWP and the workers union and acknowledged by Kepala Dinas Tenaga Kerja, Koperasi, dan UKM Kabupaten Belitung Timur.</p> <p>Based on SK Gubernur Kepulauan Bangka Belitung no. 188.44/1106/TK.T/2016 dated 25 October 2016 (effective start from 1 January 2017), the minimum wage is Rp 2.590.684. It was observed that all workers were paid based on minimum wage from Bangka Belitung Province or more than that. Contract is in local language and the union representative explains to the employees. Local employee means those living in Belitung Island and non-local employees are those outside Belitung Island but in Indonesia. The employment card indicates housing provided or not provided. Most locals (i.e. Belitung) do not require housing and prefers to stay at their own houses. Sample of workers contract are Mr. Sudiarto (No. 111/SWP/HRD-SKPKT/II/2017), stating that Mr. Sudiarto has been permanent employee since 22 April 2002. Observed also the working agreement with Mr. Sudiarto no. PKS/04/2002 dated 5 July 2002.</p> <p>For housing provided, electricity and water are also provided. Treated water from pond is sent to houses via piping (drinking water is purchased by employees). Clinic is 2KM available. Hospital is about 7KM from mill and in emergency cases, ambulance is provided. Tadika is 2KM away. Secondary school is about 7KM and transport is provided. Football field and mosque is school is about 7KM and transport is provided. Football field and mosque is available. Shops are available and credit purchases are allowed and paid</p>



		<p>monthly. Most own motorbike to travel 5KM for purchases. Employees have motorbike for travelling in and out of the estate to purchase food. Most local stay at their village. The non-locals mainly cook themselves.</p> <p>The latest PKB also has been socialized by the company to its workers. Sighted the latest PKB already socialized, dated on 6 November 2017 at Kantor Divisi Air Raya by Mr. Andy Indarto (Field Assistant), 20 people joined in this socialization.</p>
ASA 3	6.6	<p>A statement in the form of KLK Sustainability Policy. Freedom of Association and Right to Collective Bargaining has been published. Sighted in policy PT SWP “<i>Hak Kebebasan Berserikat</i>” dated 2 October 2017, signed by Mr. Rajoo Sinnappan (Agricultural Director). The policy was in local language (Bahasa). The latest socialization related to company’s sustainability policy (including freedom of association) was dated 4 February 2017. It has been attended by 26 harvester.</p> <p>All mill workers and office workers including local and non-local (from other Indonesia area) are allowed to join collective unions. Also sighted latest internal bipartite meeting between workers union and PT. SWP to discuss about collaborative working agreement dated 31 March 2017, attended by workers union and PT. SWP.</p>
ASA 3	6.7	<p>The policy for not recruiting child labour is available. The company also has SOP for new workers recruitment that stated minimum age for new worker in PT SWP is 18 th years old. Based on list of workers in PT SWP POM and field observation, there is no child labour used by company.</p>
ASA 3	6.8	<p>There is a company policy KLK Sustainability Policy which includes Equal Employment Opportunities (3.2 clause ix). Sighted Policy “<i>Kebijakan Perlakuan Yang Sama</i>”, dated 2 October 2017, signed by Mr. Rajoo Sinapan (Agricultural Director). The policy is framed and put at mill and mill office. Training records is available to show evidence of communication with employees. Sighted during site visit and record verification, no discrimination was evident. Policy on discrimination dated December 2017 sighted and framed in the office. Employees interviewed at site and clear on this Equal Employment Opportunities. Sighted Total Workers also shows no discrimination – male, female, married, non-married, local and non-local. Furthermore, no such complaint found during audit based on document review on the complaint logbook, stakeholder meeting, latest worker union’s meeting.</p>
ASA 3	6.9	<p>PT SWP has established policy “<i>Kebijakan kekerasan dan pelecehan seksual</i>”, dated 2 October 2017, signed by Mr. Rajoo Sinnappan (Agriculture Director). Policy has been communicated. Latest socialization related to company’s sustainability policy (including no sexual harrassment and violance) was dated 4 February 2017. Attended by 20 workers from POM. There was also commitee gender at the company . The purpose for this committe was to protect lady and children at the company. Policy is communicated through gender committee, Union and briefing by Management. Evidence of briefing and attendance lists sighted.</p>
ASA 3	6.10	<p>There is no smallholders scheme in SWP.</p>
ASA 3	6.11	<p>CSR program is focused on education (school, scholarship, training for teacher), clean water facilities, environment and festivals (Idul Adha, Adul Fitri, Christmast, etc.). Stakeholders can also deliver request or proposal to PT SWP regarding CSR program. The company share a questionare to local communities for the CRS activities (based on interview with Ms. Atika). Sighted qesioner from Sulistianengsih (Sekretaris Desa Bentaian), dated 23</p>

		January 2017.
ASA 3	6.12	<p>KLK Sustainability Policy Clause 3.2 (i) is available. Direct employment by locals and non-local by themselves and information from friends. Manager is responsible for screening/ interviewing the employees. No such evidence on forced or trafficked labour are used. For example, for overtime work it has to be based on willingness of the worker. Sighted sample of "Surat Persetujuan Lembur" dated 31 October 2017 of Mr. Suherman and Mr. Sudiartono.</p> <p>Employee is free to leave employment. Most employees (local) stay in their own villages and the non-local with given housing, can move around out of the estate using their motorbike or with friends and no restrictions imposed. Sighted the total list of employees and verified their employment cards for interviewed employees at site. Sighted the total list of employees and verified their employment cards for interviewed employees at site. No temporary position or migrant workers employed.</p>
ASA 3	6.13	<p>KLK Sustainability Policy (Clause 3.1) states that KLK respects and honors Universal Declaration of Human Rights dated December 2014. Communication is conducted via training (yearly) to employees. For external stakeholders, during the stakeholders briefing. No issues of human violation recorded. Latest socialization related to company's sustainability policy was dated 4 February 2017. Attended by 20 workers from POM.</p>
<b>Principle 7: Responsible Development of New Plantings</b>		
Criterion by Audit	Summary	There were no new plantings carried out.
ASA 3	7.1	There is no new planting or operations, or expanding existing ones, therefore a formal SEIA not applicable.
ASA 3	7.2	There is no new land surveyed for the growing of oil palm. However, there are sufficient SOPs available for the soil and land type that being implemented at all operating units.
ASA 3	7.3	There were no forest areas converted since November 2005.
ASA 3	7.4	There were no forest areas converted since November 2005.
ASA 3	7.5	Procedure of negotiating includes land valuation, company set values, and negotiation protocol between two parties will be manage by the Humas (Industrial Relation) Department.
ASA 3	7.6	No customary and legal rights identified. The company has a procedure to identify the people who may be entitled to receive compensation and also maintains records and details of any negotiations with details of any compensation or settlements made.
ASA 3	7.7	The company has a zero-burning policy for preparing land for planting and has a procedure in place to respond to land burning on neighboring properties.
ASA 3	7.8	No new planting applicable.
<b>Principle 8: Commitment to Continuous Improvement in Key Areas of Activity</b>		
Criterion by Audit	Summary	Sighted a regular monitoring and review of activities and development and implemented action plans that allow demonstrable continual improvement in key operations such as in minimizing use of certain pesticides, environmental impacts, maximizing recycling and minimizing waste or by-products generation, pollution prevention plans, CSR program.
ASA 3	8.1	<p>There are many improvement programs as mentioned in respective principles published in their annual company presentation. Sighted in 'Program Perbaikan Berkelanjutan' updated on September 2017 will be done for:</p> <ul style="list-style-type: none"> <li>• Mill process: installation of vertical sterilizer, thumbprint attendance</li> <li>• Environment: optimization of biogas energy, reduction of fossil fuel, addition of filter belt press</li> </ul>

	<ul style="list-style-type: none"> <li>• OSH: training for competency, OSH, RSPO, ISPO, ISCC</li> <li>• Social: workers' activities</li> </ul> <p>Both mill and estate has sufficient records and documents to justify the achievements. The Continuous Improvement Plan covers environment aspect (ban of using paraquat, maintenance of housing surrounding, signboard), health and safety aspect (using of PPE, work accident etc), social aspect (fogging, CSR, houses maintenance etc.) and others aspect such as yield improvement program, productivity etc.</p>
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#### 4.3 Non-conformity Raised During this Audit and Any from the Previous Year, if applicable


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


- If a minor-non-conformity raised at the last audit, is not closed out, then this will be raised to Major status and the company given 60 days to close this out.
- The NC number is comprised of 2 parts to include the year in which the NC was raised as well as a sequential number.


#### 4.3.1 Non-Conformities Identified during this Audit

The following NC's were raised for this audit.

NC number:	01		
Client name:	PT SWP Complex		
Date raised:	08/11/2017		
Major or Minor:	Major	Site:	PT SWP Estate
Raised by:	Nor Ashikin Shafinaz/Ahmad Furqon	Deadline:	8 Januari 2018
Aspect of standard: <b>4.7.1</b> A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.			
<b>Evidence of non-conformity:</b>			
<b>SWP Estate</b>			
Organization has established ' <i>Formulir Identifikasi Bahaya, Analisa Resiko Dan Pengendalian Resiko PT SWP 2017</i> ' for activity/Location : FFB Harvest. Based on this hazard risk assesment, it was stated that the harvester must use eyeglasses as Personal Protective Equipment (PPE) for harvesting activity.			
During site visit and interview with field workers in Mempaya division Block 96A, it was found that the implementation of Hazard Identification Risk Assessment has not yet effective. It was still found the harvester that did not use the safety eyeglass while harvesting.			
<b>Lead Assessor signature:</b>			
			
<b>Ahmad Furqon</b>			
<b>Lead Auditor</b>			
<b>Date: 8<sup>th</sup> Nov 2017</b>			
<b>Root Cause Analysis and extent: (To be filled by Auditee)</b>			
<ol style="list-style-type: none"> <li>1. Lack of awareness harvester about the use of safety eyeglass while harvesting</li> <li>2. Non-compliance of workers to company policy, especially regarding using PPE</li> </ol>			
<b>Corrective/Preventive Actions: (To be filled by Auditee)</b>			
<ol style="list-style-type: none"> <li>1. Refresment training and conduct dissemination regarding the using of PPE while conduct harvest and others activity on 18 November 2017 in Kebun Selatan, the trainer is Mr Andi Indarto, for kebun Timur on 20 November 2017.</li> </ol>			

<p>2. Dissemination regarding implementation of HIRA on 18 and 20 November 2017</p> <p>3. Special discussions in management reviews related to workers who still did not use the safety glass while harvesting, as well as evaluation of the dissemination that has been done.</p> <p>4. Management has issued the Letter of sanction to the worker who still did not use the eyeglass safety</p>	
<p><b>Evidence of Conformity:</b></p> <ul style="list-style-type: none"> <li>- List attendance and meeting minute Dissemination regarding HIRA and PPE on 18 and 20 November 2017</li> <li>- Mandore Monitoring Logbook for inspection the compliance of HIRA implementation at Kebun Selatan and Kebun timur on November – December 2017.</li> <li>- Letter of reprimand to employee who still did not use the safety glass while harvesting dated on 18 November 2017</li> </ul>	
<p><b>Review of evidences submitted to CUC:</b></p> <p>The company already conducted Refreshment training and dissemination regarding the using of PPE while conduct harvesting and others activity, on 18<sup>th</sup> November 2017 in Kebun Selatan, the trainer is Mr Andi Indarto, and in kebun Timur Divisi Mempaya dated on 20<sup>th</sup> November 2017. Also, Management has established daily monitoring and issued the Letter of sanction and Letter of reprimand to the worker who still did not use the eyeglass safety while harvesting. The corrective action has been done effectively.</p>	
<p><b>Conclusion by CUC:</b></p> <p>The verification NC closure assessment carry out is evident and therefore this <b>major non-compliance is closed</b></p>	
<p><b>NC Status:</b> Yes <input checked="" type="checkbox"/> (CLOSED) No <input type="checkbox"/> (OPEN)</p> <p><b>ON SITE VERIFICATION REQUIRED</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p><b>Lead Assessor signature:</b></p>  <p><b>Ahmad Furqon</b> Lead Auditor</p>	<p><b>Date:</b> 15 December 2017</p>

NC number:	02		
Client name:	PT SWP Complex		
Date raised:	08/11/2017		
Major or Minor:	Major	Site:	PT SWP POM
Raised by:	Ahmad Furqon	Deadline:	8 Januari 2018
<p><b>Aspect of standard: 5.3.2.</b></p> <p><b>5.3</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p> <p><b>5.3.2</b> There shall be evidence that all chemicals and their empty containers are disposed of responsibly.</p>			
<p><b>Evidence of non-conformity:</b></p> <p><b>POM SWP</b></p> <p>During observation in WTP SWP POM, it was found the waste water from emergency wash, emergency shower, and WTP Premix area flow directly in to the land.</p>			
<p><b>Lead Assessor signature:</b></p>  <p><b>Ahmad Furqon</b> Lead Auditor</p> <p><b>Date:</b> 8<sup>th</sup> Nov 2017</p>			

<b>Root Cause Analysis and extent: (To be filled by Auditee)</b> <ul style="list-style-type: none"> <li>- The facilities of water waste in WTP were not sufficient.</li> <li>- There were not the sump in Water treatment area so that the waste water from emergency wash, emergency shower, and WTP Premix area flow directly in to the land.</li> <li>- Lack of are awareness Water treatment officer regarding handling the waste water from Emergency shower.</li> </ul>	
<b>Corrective/Preventive Actions: (To be filled by Auditee)</b> <ul style="list-style-type: none"> <li>- Dissemination regarding handling waste water dated on Desember 2017 regarding handling waste water.</li> <li>- The company has made the sump for water waste in WTP, especially from emergency wash and shower.</li> </ul>	
<b>Evidence of Conformity:</b> <ul style="list-style-type: none"> <li>- List attendance and meeting minute refreshment training regarding the handling waste water on December 2017</li> <li>- The facilities which has improved with the water waste sump</li> </ul>	
<b>Review of evidences submitted to CUC:</b> Mill already conducted Refreshment training and dissemination regarding the waste water handling from WTP station on December 2017 in SWP POM. Management has created and monitored the completeness of facilities from ensure the water waste will not flow to the land. The corrective action has been done effectively.	
<b>Conclusion by CUC:</b> The verification NC closure assessment carry out is evident and therefore this <b>major non-compliance is closed.</b>	
<b>NC Status: Yes <input checked="" type="checkbox"/> (CLOSED) No <input type="checkbox"/> (OPEN)</b>	
<b>ON SITE VERIFICATION REQUIRED Yes <input type="checkbox"/> No <input type="checkbox"/></b>	
<b>Lead Assessor signature:</b>  <b>Ahmad Furqon</b> <b>Lead Auditor</b>	<b>Date: 15 December 2017</b>

#### 4.3.2 Non-Conformity Identified during the last ASA, not applicable for MA

All the last year NC status is CLOSED

#### 4.3.3 Observations Raised During this Audit

Non-were raised during this audit.

#### 4.4 Issues that were raised during the Stakeholder Consultation, if any

Stakeholders that are likely to have information relevant for the evaluation was identified during the evaluation planning process.

- For Main and Re-Assessments, a 30 day Stakeholder consultation announcement is published on the RSPO website prior to the audit. The same announcement is circulated by the client and independently by the Control Union prior to the audit.
- For subsequent Annual Assessments, it is based on stakeholders reading the approved public summary reports available on the RSPO website, the client's procedures in receiving on-going feedback or if feedback was sent directly to Control Union prior to an audit or thorough RSPO complaints procedures.

Prior to and during all assessments (Main and annual), the audit team will seek to gather evidence about all relevant principles and criteria directly from stakeholders including statutory bodies, indigenous peoples, local communities (including displaced communities, if any), workers and workers' organizations [including migrant workers], smallholders, and local and national NGOs.

During each assessment the audit team will review the company's implemented procedures in receiving feedback and will execute field visits and interviews. Not limited to the following questions, any feedback

received is reviewed and summarized in this summary report for either Part 2 – Partial Certification or Part 4 – Assessment Findings above or noted below, if applicable:

1. Do you have any remarks on the RSPO standard?
2. What is your relation with the applicant?
3. Are there any plantation or mill management practices that affect you?
4. Do you consider any management is in conflict with the RSPO principles and criteria?
5. Do you have any suggestions for management?
6. Are you aware of any HCV in the plantations or in adjacent land?
7. Are you aware of any endangered or rare species?
8. Are there any adverse (or positive) effects on local communities?
9. Additional comments?
11. Do you have any comments about the assessment team and would you like to meet with them?
12. Do you have any comments for the client’s management of any other plantations?

RSPO Principle	Stakeholder comment	CUC response
1 Commitment to transparency	<p>The stakeholder meeting was covering the 8 main principles according to the RSPO Principles &amp; Criteria. Below are the comments during stakeholders meeting :</p> <ul style="list-style-type: none"> <li>- Dinas Tenaga Kerja (Dela Wahyudi)               <ol style="list-style-type: none"> <li>a. The company active in giving positive social contribution to the local society</li> <li>b. No land in conflict happen at the company.</li> <li>c. The company has registered its employee and workers with BPJS (ketenaga kerjaan and kesehatan / work and health assurance)</li> </ol> </li> </ul> <p><u>Negative comment :</u> The company better to give PEE to its employee twice a month (currently still once a year), for safety shoes. Because the workers have to buy new shoes if the shoes is damaged, no replacement from the company (workers need to wait until next year).</p> <p><u>Clarification from PT. SWP:</u> The company actually will replace the safety shoes if the workers can show the damaged shoes as evidence. This has been supported with the records of list of PPE handed to employee. Other than that, the company consider to replace new PPE to the workers for every 6 months (still in discussion).</p> <ul style="list-style-type: none"> <li>- Dinas Tenaga Kerja (Melati Lionnita)               <ol style="list-style-type: none"> <li>a. The company’s collaborative working agreement was ok. Currently being processed at the local government level.</li> <li>b. The employee of PT. SWP have been registered</li> </ol> </li> </ul>	<p>Found positive comments from stakeholders. Negative comments has been clarified by PT. SWP. No significant issues raised during consultation.</p>
2 Compliance with applicable laws and regulations		
3 Commitment to long-term economic and financial viability		
4 Use of appropriate best practices by growers and millers		
5 Environmental responsibility and conservation of natural resources and biodiversity		
6 Responsible consideraton of employees, and of individuals and communitis affected by growers and mills		
7 Responsible development of new plantngs		
8 Commitment to continuous improvement in key areas of activities		

	<p>with BPJS</p> <p>c. HSE related report was periodically reported by the company.</p> <p>- Perangkat Desa Senyubuk (Ferdiansyah)</p> <p>a. No significant issue from Desa Senyubuk</p> <p><u>Negative comment :</u> The company not transparant in the recruitment process for local communities.</p> <p><u>Clarification from PT. SWP :</u> Actually the company has inform publicly in case any new big recruitment event. The company also shows evidence that they have join in the job fair/expo which located in the area's public school. The news also available in the local newspaper. Furthermore, the company has policy and mechanism for transparant recruitment process. The company will hire employee based on skills, education level required, health.</p> <p>- Workers Union Leader (Zainuddin)</p> <p>a. No significant issue from the workers union.</p> <p>b. The company held meeting with workers union.</p> <p>c. The company made the collborative working agreement together with the workers union.</p> <p>Negative comment : same as above (related to recruitment process of PT. SWP).</p> <p>Clarification : same as above</p>	
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#### PART 5: RSPO SUPPLY CHAIN CERTIFICATION

The palm mill mentioned in the scope of the audit was audited against the requirements of the following:  
RSPO Supply Chain Certification Systems. June 2017  
RSPO Supply Chain Certification Standard. June 2017

##### 5.1 POM Included In The Scope Of The Audit

Name Palm Oil Mill	Mill Capacity	Location	Supply Chain Model
(POM)	MT/Hour	Address	(IP or MB)
PT. Steelindo Wahana Perkasa POM	120	Desa Senyubuk, Kec. Kelapa Kampit, Belitung Timur, Sumatera, Indonesia	IP

##### 5.2 Confirmation Of The Company's Summary Of Annual Certified Volume Of RSPO Certified Palm Oil And Palm Kernel Over A Specified Period

Product CU Code	CPO (MT)	PK (MT)	Specified 12 month period
POM 1	76,156.48	19,094.35	Actual volumes between October '16 – September '17. See also 1.6 above.

### 5.3 Summary Report Including A Brief Description Of The Scope Of Certification

PT SWP POM continually improving the established RSPO Supply Chain standards since the main assessment. As part of continuous improvement, various types of trainings being planned in the mill. Palm Trace data management is managed by HQ (Ipoh, Malaysia). Organizational structure of the sustainability management system has been established. The mill manager, who acts in the capacity of top management in the sustainability management system, is responsible for decision making in the management system implementation and shall commit towards the development, improvement and implementation of the management system. Actual quantities of certified FFB delivered to the mill are entered into a central computer system and the actual quantities of CPO and PK produced are also entered and the OER is known. The quantities of certified CPO and PK are shown in real time and summarized each day on Mill Production System. A full RSPO SCCS certification audit was used during this annual assessment and the findings support the certification based on supply chain model listed above. A full RSPO SCCS certification audit was used during this Annual Surveillance Assessment and the findings support the certification based on supply chain model listed above.

### 5.4 Monthly Records of Certified and Uncertified FFB Received Since the Last Audit In case of Main Assessment, it shall be the last 12 month figure.

Figure are actual FFB production on monthly basis

No	MONTH-YEAR	Certified Supply Bases (MT)	Uncertified Supply Bases (MT), if any	Total (MT)
1	October 2016	43,483.79	-	43,483.79
2	November 2016	44,238.45	-	44,238.45
3	December 2016	38,326.80	-	38,326.80
4	January 2017	29,185.49	-	29,185.49
5	February 2017	25,588.88	-	25,588.88
6	March 2017	24,490.06	-	24,490.06
7	April 2017	24,608.62	-	24,608.62
8	May 2017	29,329.82	-	29,329.82
9	June 2017	24,321.30	-	24,321.30
10	July 2017	27,967.44	-	27,967.44
11	August 2017	30,427.79	-	30,427.79
12	September 2017	29,896.07	-	29,896.07
<b>TOTAL</b>		<b>372,864.51</b>		<b>372,864.51</b>

### 5.5 Monthly Records of Certified CPO and PK Since the Last Audit In case of Main Assessment, it shall be the last 12 month figure.

Figure are actual CPO and PK production on monthly basis

No	MONTH-YEAR	Certified CPO (MT)	Certified PK (MT)
1	October 2016	8,718.68	2,223.43
2	November 2016	8,808.65	2,345.05
3	December 2016	7,637.88	2,022.12
4	January 2017	5,891.97	1,562.06
5	February 2017	5,246.07	1,392.79
6	March 2017	5,163.54	1,328.81
7	April 2017	4,936.81	1,286.21
8	May 2017	6,096.98	1,557.00
9	June 2017	5,004.31	1,197.34
10	July 2017	5,650.45	1,325.65
11	August 2017	6,532.15	1,448.95
12	September 2017	6,469.01	1,404.94
<b>TOTAL</b>		<b>76,156.48</b>	<b>19,094.35</b>



### 5.6 Records of Certified CPO & PK Sold under GreenPlam to Buyers since the Last Audit, if Any

In case of Main Assessment, it shall be the last 12 month figure.

Figure are actual Certified CPO & PK Sold under GreenPlam to Buyers on monthly basis

No	Buyers Name	GreenPalm Trading No	Certified CPO (MT) Sold	Certified PK (MT) Sold
	Nil			

### 5.7 Records of Certified CPO & PK Sold under UTZ eTrace to Buyers since the Last Audit, if Any

In case of Main Assessment, it shall be the last 12 month figure.

If this is an Annual Surveillance Assessment, the figures used are since the last audit.

The transactions were sighted form the clients registered UTZ eTrace Account.

No	Buyers Name	UTZ eTrace Trading No	Certified CPO (MT) Sold	Certified PK (MT) Sold
1	Steelindo Wahana Perkasa (KCP)	RSPO_AC1000001101		14,242.66 (01-09-2015 to 09-04-2017)

\*CPO sold as other certified scheme (ISCC): 46,897.691 MT (Jan-Sept 2017)

### 5.8 Non-Conformities Identified during this Audit

#### Timeline for compliance:

- All non-conformances observed during an audit shall be classified as 'major' since all requirements for Supply Chain certification have to be met before granting certification.
- For Main Assessments, all non-conformances shall be addressed satisfactorily by the operation before certification may be granted by the certification body. If non-conformances are not addressed within three (3) months of the audit, a full re-audit shall be required. The certification body shall assess the effectiveness of the corrective and/or preventive actions taken before closing out the non-conformances.
- For Annual Surveillance Assessments, non-conformances raised after the certification are serious (i.e. must be considered as a major) and the integrity of the RSPO Supply Chain Certification is at risk. A maximum of one month is to be given to the certified client to satisfactorily address the non-conformance. The certification body shall assess the effectiveness of the corrective and/or preventive actions taken. Should the nonconformance not be addressed within the one-month maximum timeframe, a suspension or withdrawal of the certificate and a full re-audit may be necessary.
- If no non-conformances are observed at an audit or when the corrective action plan has satisfactorily addressed raised non-conformance(s), the client shall be recommended for (re-) certification.

Non-were raised during this audit.

NC Number:	Nil
Date:	
Reference to standard:	
Standard requirement:	
Evidence of non-compliance:	

### 5.9 Description of the Organizational Management Systems

Including organizations, management and operational systems to ensure compliance with the RSPO Supply Chain Certification Systems and Standards as detailed above

This palm oil mill and its supply bases were audited against RSPO SCCS. The mill processing capacity is 120 ton FFB per hour. The mill is capable of handling MB supply chain model.

### 5.10 Final Certification decision by Control Union for the RSPO SCCS Audit of the POM

Recommendations made:	Yes
Summary of non-compliances:	
Certification status of client:	The POM included in the scope of this audit demonstrated full compliance with the RSPO SCCS. With effect from the certification date given in the RSPOPC certificate, this POM mentioned in the scope of this report is considered to be certified in accordance with the RSPO SCCS.

**PART 6: CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY**

**6.1 Date of next ASA**

The provisional date for the next ASA is: October 2018 (ASA 4)

**6.2 Date for Closure of Non-Conformities**

See sections above for details of NC's, if any

- All major NCs to be closed by: 09/01/2018
- All minor NCs to be closed by: Before next surveillance audit

**6.3 Signing by the Client**

I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents and audit findings as presented in this document .

I also confirm:

- Acceptance of liability in execution of the instructions given.
- That this company was made aware that the findings of the audit team are tentative; pending review and decision making by the duly designated representatives of Control Union Certifications.
- That during the closing meeting all agenda items was covered by the Lead Auditor.

**Acknowledged by:**

Name: Rajoo Sinappan  
Position: Agricultural Director  
Date: 31/01/2018


  
**PT. STEELINDRA MAHANA PERKASA**  
 Signature

**6.4 Signing by the Lead Auditor**

I the undersigned, being the Lead Auditor, confirm that this report is an accurate record of the findings and of the closing meeting. I further confirm that the summary of the findings as presented in this report are a true representation of the actual findings of the audit team.

**Acknowledged by:**

Name: Ahmad Furqon  
Position: Lead Auditor  
Date: 15/12/2017

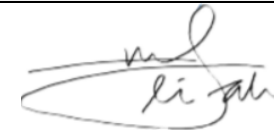
  
 Signature

**6.5 Signing by the Certifier**

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

**Acknowledged by:**

Name: Nor Atiqah  
Position: Certifier  
Date: 02/02/2018

  
 Signature

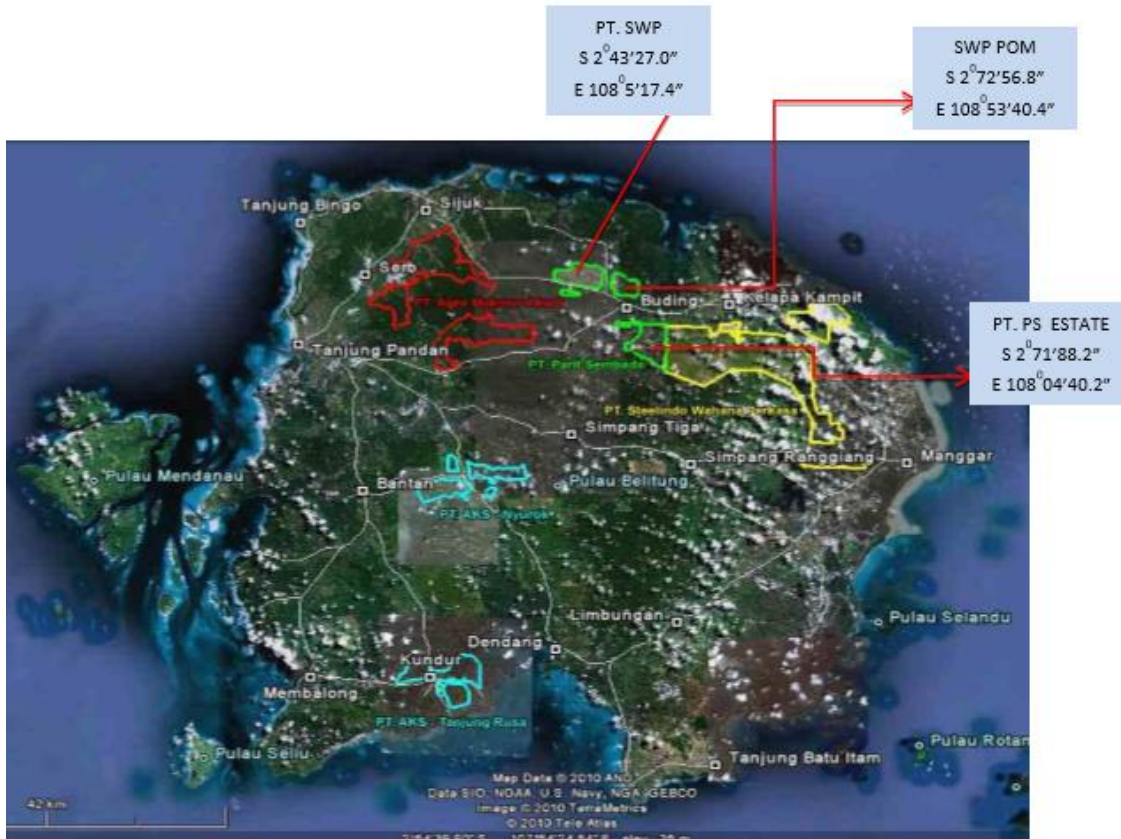
**PART 7: APPENDICIES**

**Appendix 1: Location Map for this Certification Unit**

From 1.9, the location map(s)







## Appendix 2: Summary of GHG Emissions

All data inputs and the use of RSPO PalmGHG Calculator (include the version number) have been verified with the final summary of the net GHG emissions (tCO<sub>2</sub>e/tCPO) figure in relation to C5.6

Calculation option applied for the reporting: Full Version / Apply November 2005 cut off for LUC / Exclude LUC Emission [Select as applicable]

### Summary of Net GHG Emissions

Emissions per Product	tCO <sub>2</sub> e/tProduct
CPO	2.37
PK	2.37

Extraction	%
OER	20.42%
KER	5.12%

Production	t/yr
FFB processed	372,864.51
CPO Produced	6,156.48

Land use	Ha
OP planted area	17,197
OP planted on peat	0
Conservation (forested)	0
Conservation (non forested)	742.71
<b>Total</b>	<b>17,</b>

### Summary of Field Emissions and Sinks

Emissions	Own Crop		Group		3rd Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e /tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e /tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e /tFFB
<i>Land Conversion</i>	266151.24	0.91	71496.53	0.9	0	0	337647.8	1.81
<i>*CO<sub>2</sub> Emissions from Fertiliser</i>	15085.06	0.05	3752.62	0.05	0	0	18837.68	0.1
<i>**N<sub>2</sub>O Emissions</i>	16799.98	0.05	3129.47	0.04	0	0	19929.45	0.09
<i>Fuel Consumption</i>	1355.68	0	86.41	0	0	0	1442.09	0
<i>Peat Oxidation</i>	0	0	0	0	0	0	0	0
<b>Sinks</b>							0	0
<i>Crop Sequestration</i>	-125802.97	-0.43	-33794.6	-0.42	0	0	-159598	-0.85
<i>Conservation Sequestration</i>	0	0	0	0	0	0	0	0
<b>Total</b>	172588.99	0.59	44670.43	0.56	0	0	217259.4	1.15

### Summary of Mill Emissions and Credits

	tCO <sub>2</sub> e	tCo <sub>2</sub> e/tFFB
<b>Emissions</b>		
<i>POME</i>	7716.17	0.02
<i>Fuel Consumption</i>	321.41	0
<i>Grid Electricity Utilisation</i>	0.00	0
<b>Credits</b>		
<i>Export of Grid Electricity</i>	0	0
<i>Sales of PKS</i>	0	0
<i>Sales of EFB</i>	0	0
<i>Total</i>	3037.58	0.02

### Palm Oil Mill Effluent (POME) Treatment

Divert to compost	0 %
Divert to anaerobic digestion	100 %

### POME Diverted to Anaerobic Digestion:

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

### Appendix 3: GHG assessment for new plantings

GHG assessment report for new plantings developed as per 'Chapter 6 – Reporting of GHG assessment for new plantings' within RSPO GHG Assessment Procedure for New Plantings Version 3 was verified by the auditors as part of this evaluation in relation to C7.8

Note: Extract the GHG assessment for new plantings developed by the client under 'Chapter 6 – Reporting of GHG assessment for new plantings' in RSPO GHG Assessment Procedure for New Plantings Version 3 and list below.

### Appendix 4: List of Abbreviations

AMDAL	Analisis Mengenai Dampak Lingkungan
BOD	Biological Oxygen Demand
BRC	British Retail Consortium
CHRA	Chemical Health Risk Assessment
CoC	Chain of Custody
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSR	Corporate Social Responsibility
CU	Control Union
CUC	Control Union Certifications
DOE	Department of Environment
EFB	Empty Fruit Bunch
EIA	Environment Impact Assessment
ERT	Endangered Rare or Threatened species
EU	European Union
FFB	Fresh Fruit Bunch

FSC	Forest Stewardship Council
FSC COC	Forest Stewardship Council Chain of Custody
FSC FM	Forest Stewardship Council Forest Management
GGL	Green Gold Label
GMP	Good Manufacturing Practice
GOTS	Global Organic Textile Standard
GTP	Good Trading Practice
GPS	Global Positioning System
HACCP	Hazard Analysis and Critical Control Point
HCV	High Conservation Value
HCVF	High Conservation Value Forest
HGU	Hak Guna Usaha
IPM	Integrated Pest Management
JAS	Japanese Agricultural Standard
MSDS	Material Safety Data Sheet
NC	Non Conformity
OE	Organic Exchange
OER	Oil Extraction Rate. (CPO as a % of the mass of FFB).
OSH	Occupational Safety and Health
OSHAS	Occupational Safety and Health Assessment Scheme
P&C	Principle and Criteria
PEFC	<i>Programme for the Endorsement of Forest Certification</i>
PET	Polyethylene Terephthalate
PK	Palm Kernel
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RKL	Rencana Pengelolaan Lingkungan Hidup
RPL	Rencana Pemantauan Lingkungan Hidup
RSPO	Roundtable on Sustainable Palm Oil
RSPO NI	Roundtable on Sustainable Palm Oil National Interpretation
RTE	Rare, Threatened, and Endangered
SA8000	Social Accountability 8000
SEIA	Social Environmental Impact Assessment.
SIA	Social Impact Assessment
SOCSSO	Social Security Organisation
SOP	Standard Operating Procedure
UKL/UPL	Upaya Pengelolaan lingkungan (UKL) / Upaya Pemantauan Lingkungan (UPL)
USDA/NOP	United States Department of Agriculture – National Organic Program
MT	Metric Tonnes
WHO	World Health Organization