

*Roundtable on Sustainable Palm Oil Certification
RSPO*

[✓] Initial Certification

Name of Management Organisation : **POM 1 PT Bio Inti Agrindo subsidiary of PT Bio Inti Agrindo**
 Plantation Name : **PT Bio Inti Agrindo – Estate A and Plasma Division 1**
 Location : **Village of Selil, Sub District of Ulilin, District of Merauke, Province of Papua, Indonesia**
 Certificate Code : **MUTU-RSPO/158**
 Date of Certificate Issue : 13 September 2021 Date of License Issue : 13 September 2021
 Date of Certificate Expiry : 12 September 2026 Date of License Expiry : 12 September 2022

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
IC	16, 17, 19, 20 to 21 October 2020	Satria Adi Putra (Lead Auditor Witnessed), Leonada (Auditor Witnessing), Brigitta Prita, Sansan Suhendar and Putri Oktariani	Harso Yuli Antena	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
IC	13 September 2021

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Figure 1. Location Map of PT Bio Inti Agrindo



Abbreviations Used

AMDAL	:	Environmental Impact Analysis
ANDAL	:	Environmental Impact Analysis
BKSDA	:	Natural Resources Conservation Centre
BOD	:	Biochemical Oxygen Demand
BTN	:	Balai Taman Nasional/National Park Hall
BPJS	:	Social Security Administrator
CDKLH	:	Environment Agency
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
DLH	:	Environment Agency
DPMPTSP	:	Integrated Investment and Licensing Service
DPUPR	:	Department of Public Works and Spatial Planning
FFB	:	Fresh Fruit Bunches
FGD	:	Forum Group Discussion
FPIC	:	Free, Prior, Informed and Consent
GHG	:	Green House Gas
HCV-ALS	:	High Conservation Value - Assessor Licensing Scheme
HIRAC	:	Hazard Identification and Risk Assessment Control
HGU	:	Cultivation Right
JKM	:	Life insurance
JKK	:	Accident insurance
KITAS	:	Temporary Stay Permit Card
KepmenLH	:	Decree of the minister of environment
KLDKLH	:	Environment Agency
K3	:	Occupational Health and Safety
LA	:	Land Application
MB	:	Mass Balance
PJK3	:	Occupational health and safety company
PK	:	Palm Kernel
PKB	:	Collective labour agreement
POM	:	Palm Oil Mill
PPE	:	Personal Protective Equipment
PR	:	Public Relation
PT BIA	:	Perseroan Terbatas Bio Inti Agrindo
P2K3	:	Occupational health and safety advisory committee
RKL	:	Environment Management plan
RPL	:	Environmental Monitoring Plan
RSPO	:	Roundtable Sustainable Palm Oil
RTE	:	Rare, Threatened and Endangered
SIA	:	Social Impact Assessment
SIO	:	Operator license
SPK	:	Work agreement
TPSA	:	Final Waste Disposal Site
TPS LB3	:	Hazardous Warehouse
TSS	:	Total Suspended Solid
SOP	:	Standard Operational Procedure
SPSI	:	Worker union
WWF	:	World Wildlife Fund
WWTP	:	Waste Water Treatment Processes

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020. RSPO Certification System for Principles and Criteria, 14 June 2017 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT BIO INTI AGRINDO	
1.2.2	Contact person	Kartika Dewi	
1.2.3	Organisation address and site address	Central Office: Gedung Pacific Century Place, Lantai 17, SCBD Lot 10, Jl. Jendral Sudirman Kav. 52 - 53, Jakarta 12190	
1.2.4	Telephone	+ 62 21 80864070	
1.2.5	Fax	+ 62 21 80864100	
1.2.6	E-mail	bia@ptbia.co.id	
1.2.7	Web page address	www.ptbia.co.id	
1.2.8	Management Representative who completed the application for certification	Kartika Dewi	
1.2.9	Registered as RSPO member	1-0257-18-000-00 (27 July 2018)	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	POM 1 and its supply base: Estate A and Plasma Division 1	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	POM 1	Selil Village, Ulilin Sub District, Merauke District, Papua Province, Indonesia	S 06° 57' 47.7" E 140° 30' 40.5"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Estate A	Selil Village, Ulilin Sub District, Merauke District, Papua Province, Indonesia	S 06° 57' 39.5" E 140° 29' 46.7"
	Plasma Division 1 (523 members)	Selil Village, Ulilin Sub District, Merauke District, Papua Province, Indonesia	S 06° 58' 51.0" E 140° 33' 12.8"
1.5	Description of Area Statement		
1.5.1	Tenure		
	• State		6,666.90 Ha
	• Community		- Ha

1.5.2	Area Statement						
			Own Estate	Scheme Smallholder	Total		
	• Total area		6166.90	500.00	6,666.90		
	• Mature area		5,623.51	453.01	6,076.52		
	• Mill		13.91	-	13.91		
	• Emplacement		21.50	-	21.5		
	• Road, bridge and trench		126.20	13.59	139.79		
	• River, valley, hill and swamp		84.29	3.23	87.52		
	• HCV		297.49	30.17	327.66		
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Estate A	Plasma Divisi 1	Total			
	Mature						
	2012	1,813.39	0	1,813.39			
	2013	3,540.57	0	3,540.57			
	2014	269.55	453.01	722.56			
	TOTAL	5,623.51	453.01	6,076.52			
1.6.2	New Planting area after January 2010		6,076.52 Ha				
1.6.3	Planting Cycle		1 st Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	POM 1	60	224,408.79	57,523.87	25.36	7,833.48	3.49
	<i>*Production data source from 12 months before assessment (October 2019 to September 2020)</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Estate A	6,166.90	5,623.51	183,804.07	32.68	181,725.63	98.78
	Plasma Division 1	500.00	453.01	13,488.26	29.77	13,262.20	98.32
	TOTAL	6,666.90	6,076.52	197,292.33	32.47	194,987.83	98.55
	<i>*Production data source from 12 months before assessment (October 2019 to September 2020)</i>						
1.7.3	FFB description from other source						
	Name of sources/ Organisation		Type of Organisation	Number of smallholders	Production Area (Ha)	Supplied to Mill	
						FFB (tonnes/year)	
	PT Cahaya Bone Lestari (Non-RSPO Certified)		Independent Out grower	-	341	771.32	

	PT Internusa Jaya (Non-RSPO Certified)	Independent Out grower	-	5,993	4,333.42			
	Estate B (Non-RSPO Certified)	PT Bio Inti Agrindo	-	9,402.49	16,789.89			
	Estate C (Non-RSPO Certified)	PT Bio Inti Agrindo	-	9,493.36	7,526.33			
	TOTAL				29,420.96			
	<i>*Source Production Data on 12 months before assessment (October 2019 to September 2020).</i>							
1.7.4	Product categories	FFB, CPO, PK						
1.8	Tonnage of Product							
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)				
	FFB Processed		-	-				
	CPO Production		-	-				
	Palm Kernel (PK) Production		-	-				
	<i>*Will be verified at surveillance audit.</i>							
1.8.2	Product selling							
	Type of selling product	Actual selling product for last year (mm yy to mm yy) (MT)						
	CSPO sold as RSPO certified product	-						
	CSPK sold as RSPO certified product	-						
	CSPO sold under other scheme	-						
	CSPK sold under other scheme	-						
	CSPO sold as conventional	-						
	CSPK sold as conventional	-						
	<i>*Will be verified at surveillance audit.</i>							
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Estate A	6,166.90	5,623.51	190,000	33.79			
	Plasma Division 1	500.00	453.01	14,000	30.90			
	TOTAL	6,666.90	6,076.52	204,000	32.35			
	<i>*Projected FFB production for 12 months of certificate</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	
	POM 1	60	204,000	51,000	25	7,140	3.5	MB
	<i>*Projected CSPO and CSPK production for 12 months of certificate</i>							
	<i>*Due to sanction, the production of FFB, CPO and PK cannot be claim as certified product</i>							
1.9	Other Certifications							
	ISPO							
	MUTU-ISPO/179 date on August 22, 2019 – August 21, 2024.							

1.10	Time Bound Plan					
1.10.1	Time Bound Plan for Other Management Units					
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
	MILL	Time Bound Plan				
	POM 1	2020	Estate A	2020	District of Merauke, Province of Papua, Indonesia	IC
	POM 2	2020	Estate B	2020	District of Merauke, Province of Papua, Indonesia	IC
			Estate C	2020	District of Merauke, Province of Papua, Indonesia	IC
	Time bound plan approved on 2020					
1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard					
	Smallholder are included in scope of certification.					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
IC	<ol style="list-style-type: none"> 1. Leonada (Lead Auditor Witnessing). Bachelor of agriculture for plant breeding and seed technology programme study, department of agronomy, faculty of agriculture in Bogor Agricultural University. Having experience of more than five years working as a plantation operations staff and sustainability in private company of Indonesian oil palm plantations and is currently working on independent certification bodies as auditor. Training have been followed are: training of indonesian sustainable palm oil (ISPO) lead auditor, training of RSPO lead auditor, RSPO SCCS training, SA 8000, ISO 17021; 2011, ISO 17065; 2012, ISO 19011; 2011, lead auditor ISO 9001; 2008, ISO 14001; 2005, training of management development program agronomy, training of analysis base solution for operation, training of integrated pest management (IPM), use of limited pesticides training, training management of waste pesticides and fertilizers, training mediation and conflict resolution, RSPO social and worker welfare training, general safety specialist training, health and safety management system (SMK3) auditor. In this audit He conducted witness to Lead Auditor 2. Satria Adi Putra (Lead Auditor Witnessed). Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert, Orang Utan and Wildlife Management, ISPO Auditor Training, ISCC Auditor, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, SA 8000, RSPO Lead Training, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011, ISO 22000. During this assessment he was verified worker welfare, best management practices and transparency aspect. 3. Brigitta Prita (Auditor). Citizen of Indonesia. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism. She had attended Training ISPO by Commission ISPO on June 2013, Training ISO 9001:2008 Quality Management System on January 2014, In House Training 17021 and 17065 management system and Product Quality, Training High Conservation Value by IPB on September 2015, In House Training HCV on August 2016, In House Training Roundtable Sustainable Palm Oil on January 2014; In House Training ISO 14000:2004 Environmental Management System, Training Lead Auditor RSPO by Daemeter and Proforest on July 2017; Training SA 8000 by Internal Company; Training Lead Auditor SCCS by BM Trada on June 2018; and Training social & worker welfare from RSPO on January 2019. She has been audited experience ISPO & RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. In this audit activity performs the assessment of legalities, social and Supply Chain. 4. Sansan Suhendar (Auditor), Indonesian citizen, graduated in 2008 from the Department of Forest Product Technology, Faculty of Forestry, Bogor Agricultural Institute. He has experience as a Health, Safety and Environment (HSE Officer) Assistant at the Astra Agro Lestari Group (2010-2016) including PT Sumber Kharisma Persada (2010-2015) and PT Sari Aditya Loka 1 (2015-2016). Have experience in implementing sustainable palm oil management systems (ISPO), implementing occupational safety and health management systems, environmental management, managing areas with high conservation value, and implementing food safety management systems (HACCP) in palm oil mills. He has experience as an ISPO, RSPO auditor and as a Technical Expert for auditing ISO 45001 and ISO 14001 in the Forestry sector when he joined PT SAI Global Indonesia from November 2017 to February 2020. The training that has been attended is: OHS Expert in 2011, High Conservation Value Forest / Area (HCVF / HCVA) in 2012, Food Safety (Hazard Analysis Critical Control Point) HACCP in 2013, ISPO batch 14 with No. certificate 670A / TU.010 / E-ISPO / 12/2014 in 2014, RSPO with no. certificate SS-RSPO-P & C-20/07/18 in 2018, Basic, Implementation and Lead Auditor of Quality Management System (ISO 9001: 2015) in 2018, Occupational Health and Safety Management System (ISO 45001: 2018) in 2019 and Environment Management System (ISO 14001: 2015) in 2020. At this time the audit carried out verification on environmental/conservation and GHG aspects. 5. Putri Oktariani (Observer) Indonesian citizens. Master in Environmental Resources, Faculty of Agriculture. Has experiences as a researcher assistant and laboratory staff in horticultural company. Has attended several trainings such as Lead Auditor of ISO 14001:2015, ISO 9001:2015, IHT in social and worker welfare aspect, and awareness quality management system and safety.

2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
IC	Number of auditors : 3 auditor Number of days for IC at site : 5 days Number of working days for IC at site: 15 Working days.
2.2.2	Assessment Process
IC	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bio Inti Agrindo – POM 1 to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria, 14 June 2017.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results <i>IC</i> delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase <i>ASA-1</i>.</p> <p>All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of <i>IC</i>.</p> <p>The assessment program please find Appendix 2</p>
2.2.3	Locations of Assessment
IC	<p>POM 1.</p> <ul style="list-style-type: none"> • Security Post. Observation and interview related fruit reception, OHS, workers welfare etc. • Weighbridge Station. Observation and interview related fruit reception, FFB separation, OHS, worker welfare etc. • Work Shop. Observation of environmental conditions and OHS, welding PPE and interviews • Central warehouse. PPE stock observation and pressure tube storage. • Chemical Warehouse. Observation of the environmental conditions of the availability of emergency response facilities and MSDS. • Hazardous Waste Warehouse. Observation of environmental conditions and interviews, availability of emergency response facilities, recording, management and hazardous waste symbols. • Leachate Stockpile. Observation of environmental conditions. • WTP. Observation of environmental conditions and OHS and interviews, availability of emergency response facilities. • WWTP. Observation of environmental and OHS conditions, availability of emergency response facilities, and pump houses. • Hydrant System Simulation. Hydrant system function simulation. <p>Estate A</p> <ul style="list-style-type: none"> • Workshop. Observation of environmental conditions and OHS, welding PPE and interviews • Central warehouse. PPE stock observation and pressure tube storage. • Warehouse of fertilizers and chemicals / pesticides. Observation of the environmental conditions of the availability of emergency response facilities and MSDS. • Home Rinse. Observation of environmental conditions • Oil store. Observation of environmental conditions, MSDS, emergency response facilities. • Fire Warehouse and Fire Car. Observation of fire conditions and simulation of the function of fire engines and supporting equipment. • Clinic. Observation of environmental conditions, medical waste management, recording system for occupational accidents and occupational diseases.

	<ul style="list-style-type: none"> • Hazardous Waste Warehouse. Observation of hazardous waste management, availability of emergency response facilities, recording, and hazardous waste symbols. • Housing. Observation and interviews, the adequacy of clean water, lighting, waste management, and the housing environment. • School, mosque, daycare. Observation related to worker facilities and interview related to worker welfare. • Harvest block 1.57. Observation and interview related to health and safety aspect and worker welfare aspect • Spray block 3.26. Observation and interview related to health and safety aspect and worker welfare aspect • Fertilizer Application Block 2.10 Observation and interview related to health and safety aspect and worker welfare aspect • HGU Stake, Block 1-1 & Block 2-33. <p>Plasma Division 1</p> <ul style="list-style-type: none"> • Harvest block 10.26. Observation and interview related to health and safety aspect and worker welfare aspect • Spraying block 9.23. Observation and interview related to health and safety aspect and worker welfare aspect
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
IC	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Bio Inti Agrindo – POM 1 was held by:</p> <ol style="list-style-type: none"> 1. Public Notification on PT Mutuagung Website on 7 September 2020. 2. Consultation with NGO (Walhi, Sawit Watch, AMAN & WWF) via email on 2 October 2020. 3. Public consultation with government institutions of Merauke Regency (National Land Agency or BPN, Agriculture Agency, Manpower Agency, Environment Agency) 14 October 2020. 4. Public consultation meeting with locals of the nearby Village (Mandekman Village, Kindiki Village and Selil Village) 14 October 2020. 5. Consultation meeting and interview with internal stakeholder such as labor union, gender committee & local contractor on 16 October 2020. <p>Numbers of input from stakeholders were clarified by PT Bio Inti Agrindo – POM 1</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit <i>ASA-1</i> will be conducted eight (8) month to twelve (12) month after certificate issued.

3.0 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of PT Bio Inti Agrindo – POM 1 operation consisting of one (1) mill and one (1) own estate and one (1) scheme smallholder.

During the assessment, there were one (1) Nonconformities were assigned against Major Compliance Indicator; five (5) nonconformities were assigned against Minor Compliance Indicators and two (2) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. document record/photographic/etc. Those corrective actions taken that consist of one (1) Major non-conformity and three (3) Minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that PT Bio Inti Agrindo – POM 1 complied with the requirements of **Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria, 14 June 2017.**

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is issued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY	
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
<p>1.1.1 The company has a list of information & stakeholder related the transparency of company. The documents that can be accessed for example:</p> <ul style="list-style-type: none"> • HGU certificate • AMDAL document • RKL-RPL report • HCV (High Conservation value) • POME permit • Hazardous storage permit • Social Impact Assessment report • SOP • OHS Plan • Sustainability policy, Etc <p>These documents can be accessed by sending a request to management.</p>	
<p>1.1.2 Based on the results of the document review and interviews, it is known that:</p> <ul style="list-style-type: none"> - Regulation of the Minister of Manpower No. 100 of 2004 concerning the provisions for the implementation of a certain time work agreement (PKWT) Article 13 states that the PKWT must be registered by the entrepreneur to the agency responsible for manpower affairs at the local regency/municipality no later than 7 (seven) days after signing. - The results of an interview with the Papua Province Manpower Supervisory Agency revealed that the company had 	

not submitted the latest report on the use of PKWT workers.

- The results of the review of the company's employee list document for September 2020 revealed that there were 294 PKWT employees at Estate A and 37 PKWT employees at POM 1.

Related to this, the company has not been able to show evidence that reports on the use of PKWT workers have been presented and accessed by relevant stakeholders. This is a non-conformity No. 2020.01.

1.1.3

The company has procedures related to Communication (SOP/DCO/01 dated 24 December 2017). The procedure describes the classification of information, provision of communication media/materials, implementation of internal/external communications and reporting and evaluation of communication effectiveness. In addition, there is a Communication Management Work Instruction (IK/DOC/01 dated 17 December 2019) which details the mechanism for requesting public information, in addition to explaining the timeframe for submitting responses, which is 21 days.

Based on the results of the verification of the request for information, it is known that the company has recorded and responded to incoming letters for example letter number 421.5/006/60302727/2020 dated January 17, 2020 regarding the placement of students to do field work practices. Regarding this, the company has provided a response on February 7, 2020. The results of interviews with several government agencies, community leaders, contractor partners, and other stakeholders revealed that they had understood the communication procedures with the company.

1.1.4; 1.1.5

The company has procedures for communication and consultation with stakeholders in the Communication Procedure (SOP/DCO/01 dated 24 December 2017). Based on the SOP, the PIC for internal communication is the Estate manager and the PIC for external communication is the general manager and general staff. The company has also shown a form of communication and held a meeting of the parties on June 23, 2020. The parties who attended were government officials, communities and relevant stakeholders such as the Head of Data Control and Management, Head of the Environment Agency, Industry Office, SME Trade & Cooperatives, Manpower Office, Agricultural Quarantine Agency, Head of Education Office, Head of Border Management Agency, Head of Wasur National Park Office, Head of District, Head of Customs and NGOs. . Verification of the stakeholder list has been carried out through document review and interviews with stakeholders such as government institutions of Merauke Regency, previous land owner and with locals of the nearby Village (Mandekman Village, Kindiki Village and Selil Village).

The company also has a list of stakeholder contacts who deal directly with the company. The list that informs the name of the institution / agency, the name of the contact person, position, mobile number, and address. The list of stakeholders consists of indigenous peoples and community leaders, institutions (officials) and related institutions, relevant government agencies.

Verification of the stakeholder list has been carried out through document review and interviews with stakeholders such as government institutions of Merauke Regency and with locals of the nearby Village (Mandekman Village, Kindiki Village and Selil Village).

1.1.2 | **Status: Non-conformity No. 2020.01 with non-critical criteria**

1.2

The unit of certification commits to ethical conduct in all business operations and business transactions.

1.2.1

The company has a policy of ethical behavior in the Directors Decree document No. BIA / DIR / 01/171221 concerning the Company Code of Ethics which was signed by the President Director on December 22, 2017. Based on this document, PT BIA is committed to acting ethically in all business transactions at oil palm plantations and mills as well as contractors including:

- Applying fair business practices
- Prohibit all forms of corruption, bribery and fraud in the use of funds and resources
- Provision of business information in accordance with applicable law and acceptable industry practices.

The company has also shown documents for proof of socialization of the company's code of ethics at Estate A on 18 April

2020.	
1.2.2	
The company already has a system for monitoring compliance and implementing ethical policies, among others, by ensuring that HRD is exempt from employee recruitment fees or receiving gifts/commissions from recruitment agencies. To ensure the compliance of ethical policies, company conduct internal audit RSPO 2 times a year and based on internal audit semester 1 of 2020 sighted there was no non-compliance of ethical policies.	
	Status: Comply
PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS	
2.1	
There is compliance with all applicable local, national and ratified international laws and regulations.	
2.1.1.	
Plantation Business Assessment Certificate. Unit management has received a certificate of plantation business assessment with an operational stage for 2019 with category I (Very Good) on November 11, 2019 by the Papua Provincial Plantation Agency.	
Legality & Best Management Practices	
Unit management shows the submission of mandatory reports, such as:	
<ul style="list-style-type: none"> • Report on the use and utilization of Business Use Rights to the Land Agency of Merauke Agency dated February 19, 2020. • Plantation business development report for the period July – December 2019 to the Food Crops Horticulture and Plantation Agency of Merauke Regency dated January 14, 2020. • Report on investment activities for the stage of development semester II by online dated on April 14, 2020 to the Investment Coordinating Board of Merauke Regency, report number 610079. • Plantation Business Assessment Report for the January – June 2020 Period to the Food Crops, Horticulture and Plantation Agency of Merauke Regency on August 31, 2020. 	
2.1.2.	
Unit management shows procedure for the identification of laws and regulations and evaluates the fulfillment of applicable legal requirements with number SOP / DCO / 06 dated January 30, 2020. This procedure informs about the identification of laws, regulations and other provisions; evaluation of compliance with laws and other requirements; information, communication and consultation; evaluation and reporting. To ensure the up-to-date list of related regulations, control documents together with the management representative and the Manager of each division review and actively seek information about regulations every 6 months and no later than once a year. Regulatory identification records are kept with the shelf life.	
Unit management has identified and evaluated compliance with regulations & other requirements which informs regulations or requirements, application method, PIC, Evidence of implementation, status and follow-up on non-conformities. Unit management already has a list of regulations for the 2020 period containing Law No. 18 of 2004 concerning plantations (has been replaced by Law No. 39 of 2014) and <i>Permenaker</i> No. 1 of 1999 regarding minimum wages (has been replaced by <i>Permenaker</i> No.7 of 2013) etc.	
2.1.3.	
Unit management shows the procedure for maintenance of HGU stakes with number SOP / KBN / 25 dated on March 17 2020 revision 01. In this procedure, it informs the monitoring of the stake, sees the conditions around the <i>HGU</i> stake, prepares for the maintenance of the stake, evaluates and reports. The Division Assistant makes a schedule for monitoring <i>HGU</i> stakes every 4 months.	
Based on field observation, in HGU stakes block number 1-1 Division 3 and 2-33 Division 4. The stakes are well maintained and in accordance with the HGU coordinate points.	
	Status: Comply

2.2 All contractors providing operational service and supplying labour, and Fresh Fruit Bunch (FFB), comply with relevant legal requirements.vv

2.2.1.
Unit management Estate A shows list of contractors for periode 2020 such as: CV Alvariz, CV Citra Abadi, CV Papua Lestari Jaya, and CV Binagun Jaya (contractors for the procurement of labor is used for maintenance and harvesting activities). Unit management of Division 1 Plasma shows list of contractors for periode 2020 such as CV Rhava Jaya Abadi and CV Giat Indo Utama (contractor with business unit is rent of vehicle)

2.2.2.
Unit management shows a cooperation agreement with FFB suppliers for the 2019-2020 period, consist of:

- The FFB sale and purchase agreement letter between PT Bio Inti Agrindo and PT Internusa Jaya Sejahtera with the number PT BIA-TBS-200930A dated 30 September 2020..
- Cooperation agreement letter number 04/BIA/SPK/AGR/2020-A dated July 1, 2020 – June 31, 2021 between PT BIA and CV Rhava Karya Abadi for vehicles contract at Estate A. Article 7 Rights and obligations of the first party. The first party provides PPE in the form of a helmet, boots and gloves to the second party. The second party is required to involve its workers in the insurance program (*BPJS TK & KES*) and other insurance at their own expense and show written evidence in the form of a membership certificate to the first party.
 - Evidence of Payment for *BPJS TK (JKK & JKM)* in October 2020 dated October 19, 2020 amounted to IDR 236,321 (8 workers) through BNI Bank (Reference number 425581).

2.2.3.
In all agreement between unit management and cooperation there is clause regarding right and obligation for parties such as:

- It is prohibited to employ minors in accordance with Law No.13 of 2003 (employ mean child labor).
- The second party must not be involved in the practice of human trafficking.
- The second party may not be involved in forced labor practices.

Status: Comply

2.3 All FFB supplies from outside of the unit of certification are from legal sources.

2.3.1.
Unit management shows geolocation information, the location of FFB sources, ownership status and planting / operating / trading permits for the period 2019-2020, such as:

Sales name	Owner land status	Village	Point coordinate	Permit land/operation/trading
PT Internusa Jaya Sejahtera	HGU number 24/HGU/KEM-ATR/BPN/2018 dated on March 19, 2018.	Ulilin and Elikobel Sub-District and Merauke Regency	7°16'42" S and 140°46'33"E	Plantation Business Permit with the name 04 / SK.IUP / PKS / 2014 dated December 15, 2014 with a net area of 18,587.05 ha. The capacity for FFB is 120 tons / hour and CPO is 30 tons / hour and this is 10 tons / hour for palm oil.

2.3.2.
The FFB comes from the plasma location under the name of the Mandob Sejahtera cooperative and this plasma will be included in the scope of certification.

Status: Comply

PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE

3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.

3.1.1

The company has a long term production projection contained in the 2019-2030, this plan include the scheme smallholder which fully managed by company. The document contains the projected production, CPO prices, PK, CPO and PK Revenue, cost estates, mill costs, and profitability. The long-term plan is then elaborated in the form of an annual plan, a monthly work plan in each division for each activity. The long-term plan also includes production projection and production costs for smallholders. Every month an evaluation is carried out on the achievement of the specified budget.

3.1.2

Based on the document review, the company does not have a replanting plan in the next 5 years due to the age of the plant in the operational area of the certified unit. The oldest age of the plant in the scope of certification this time is 8 years (2012 planting year).

3.1.3

To ensure that all estates and mill operational activities run well and sustainably, the certification unit carries out Management Review conducted by the top management. The Management Review serves as control and monitoring of work performance/achievement of results for one year in estates and mill. The matters reviewed are divided into several sections including the OHS section, internal audit, external audit, operational, work performance, achievement of results and other sections as a whole. The last management review was conducted on August 2020, the review meeting contains, among others, conducting a review of plant production, plant maintenance, pest control and finance, internal RSPO audit result, BMP innovation, grievance and complaint. The minutes of the meeting are available as well as the response from the President Director of the company. Based on management review result, some of internal audit RSPO need to be improve and there is no grievance from customer.

Status: Comply

3.2

The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.

3.2.1

RSPO Internal Audit

The company carried out an internal audit on December 03-06 2019. Based on the internal audit report dated December 10, 2019, it was found that there were 65 non-conformance records and had been fulfilled in full on April 2, 2020. The management review regarding this matter was carried out on March 19, 2020, attended by 16 related employees. There are 12 main points in the minutes of the management review which were passed on March 20, 2020.

Management Review Annual Plan

Evaluation of the annual plan is carried out every month and Minutes of Meeting documents have been shown up to Quarter I – March 2020. The meeting was attended by Managers from each plantation and factory as well as other staff, including Sustainability Staff, General Affair and General Response.

3.2.2

As long as the RSPO template has not available this indicator is not applicable, but the company has reported the RSPO Annual Communication of Progress 2019. The latest ACOP for period of 2019 has been submitted.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company has an SOP of Agronomy and Plant which explains the main processes such as harvesting, transportation, fertilizing, HDI, GAP, and supply chain requirements for the factory. Examples of SOP document numbers owned by a company are as follows:

- SOP for Land Opening and Preparation (Code: SOP / KBN / 01) dated 24 December 2017 Revision 00.
- Nursery SOP with Code: SOP / KBN / 02 effective date 24 December 2017 Revision 00
- Planting SOP (Code: SOP / KBN / 04) dated 24 December 2017 Revision 00.
- SOP for receiving and checking / sorting FFB activities (Code: SOP / POM / 04) dated 24 December 2017 Revision 00.

- Processing SOP (Code: SOP / POM / 05) December 24, 2017.
- And others.

The procedure that is owned by the company has covered all the main process activities from land clearing up to transporting FFB and for POM starting from receiving fruit to despatch CPO.

3.3.2

The company has a system that ensures consistency in the implementation of its SOPs, such as the Checking or Inspection of Work Quality (Internal Audit of Plant and Plant), ISPO and RSPO Internal Audit which checks whether the procedures in the company have been implemented by the audited unit and the Financial Audit carried out by external parties to ensure the use or costs used are in accordance with the rules set by the company. The company also has an SOP on Internal Audit (SOP / DCO / 04, December 22, 2017) which also explains the period of internal audits conducted every semester (once every 6 months). The company has also shown records related to the socialization of procedures to third parties at Estate A on 6-10 March 2020, activities carried out in each division.

3.3.3

The company can show reports on the results of internal audits carried out by the company's internal team, for example the ISPO and RSPO internal audit reports carried out on 18-22 August 2020. The internal audit documents the assessment of the application of ISPO and RSPO principles and criteria and in the report also conveyed the corrective and corrective actions taken.

In addition, a report on the results of quality control is also shown which is carried out once a month in the work unit of each Estate. The report also contains documentation of the results of the quality assessment of harvest work, spray, fertilizer, and others. Corrective actions and their evaluation are also available and can be shown to the auditor.

Status: Comply

3.4

A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.

3.4.1

The company already has an Environmental Feasibility Permit for Plantation Development and Palm Oil Mill Processing, which was obtained by the Regent of Merauke Decree No. 88 of 2009. In April 2009, the AMDAL documents including ANDAL and RKL-RPL for the Development of Plantation and Oil Palm Processing Factory of PT Bio Inti Agrindo in Merauke Regency, Papua Province were ratified based on the Decree of the Head of the Office for Environmental Impact Management of Mining and Energy, Merauke Regency No. 660/26/2008 which was enacted on 4 August 2008.

The scope of the ANDAL study refers to the location permit of the Merauke Regent's Decree No. 9 of 2007, dated 16 January 2007 covering an area of 39,900 hectares with a mill capacity of 120 tons of FFB / hour. Due to the increase in the number and capacity of factories, PT. BIA made changes (addendum) to the AMDAL through the Decree of the Head of the Merauke Regency Investment and One Stop Integrated Service Agency Number 663/05 / 2018 concerning the Stipulation of Environmental Permits for Plantation Development Activities and Oil Palm Processing Factory (POM) Estate B with a capacity of 60 TBS / Hours and Estate C with a capacity of 90 tons of FFB / hour by PT. Bio Inti Agrindo in Ulilin District, Merauke Regency, Papua Province.

The company already has a Social Impact Assessment Report (SIA) PT. Bio Inti Agrindo which was conducted from January 2017 to February 2017 by Aksenta. Based on the results of the evaluation of the company management that along with the development of the era and the opening of access to the community with the presence of the company, it is necessary to re-study the existing social impacts, so that in January to May 2020 the company conducted a social impact assesment by an independent assessment team, namely Ecologica Consultant. From the results of the Social Impact Assessment conducted by the Ecologica Consultant, it gave rise to several positive impacts and negative impacts, from the negative impacts that produced negative impacts that had a high risk of harming society. Further recommendations for managing existing impacts, both positive and negative, have also been included in the results of the social impact assessment. Based on interview with communities, all issue has been cover in SIA.

HCV assessment has been conducted in 2017 and in 2020 the company conduct re assessment. The detail information for HCV is inform in Criteria 7.12.

3.4.2

In making plans for social and environmental management and monitoring, the Company has also involved stakeholders, especially those directly affected, namely the village communities around the company. Participatory evidence from local communities and other stakeholders in the development of management and monitoring plans is as follows:

A. With the village around the company

- Forum Group Discussion (FGD) with Kindiki Villages / Villages was held on September 18, 2020. The list of attendees and documentation of activities can be shown by the company.
- Forum Group Discussion (FGD) with Desa / Kampung Sellil was held on September 19, 2020. The list of attendees and documentation of activities can be shown by the company.
- Forum Group Discussion (FGD) with Manda Village / Village was held on September 21, 2020. The list of attendees and documentation of activities can be shown by the company.
- Forum Group Discussion (FGD) with Mandekman Villages / Villages was held on September 22, 2020. The list of attendees and documentation of activities can be shown by the company.

B. Other Stakeholders

The company carried out a public consultation which was held on 24 September 2020 at the Halogen Hotel meeting room which was attended by 55 participants with participants who attended, such as: Assistant Secretariat, Head of Environmental Agency of Merauke District, Head of Manpower Agency, , Korindo Group, Manager of Korindo Group, Wasur National Park Bodies, LMA of Merauke Disctric, Chairman of the Omba Clan, Kampung Pahas and Chair of LMA Ghuzi Enim. Attend list and documentation of activities can the company show.

3.4.3

The implementation of environmental management and monitoring that has been carried out by the company is outlined in the report on the implementation of the RKL-RPL of PT BIA's Plantation and Oil Palm Processing Factory, Ullilin District, Merauke-Papua which is carried out every semester. The last RKL-RPL implementation report was conducted for the first semester of 2020 (January-June 2020), the report refers to the 2008 AMDAL study RKL-RPL matrix and KepmenLH No. 45 of 2005.

The report has been equipped with an evaluation of the trend towards changes in environmental quality, an evaluation of the critical level of an impact and an evaluation of compliance with the compliance level of meeting the provisions in the environmental management document.

The conclusion from the RKL-RPL report for semester I 2020, there is no measurement result of environmental parameters that exceed the quality standard limits set by statutory regulations as well as relatively positive / supportive social perceptions.

In terms of implementing the social impact management plan, the company has implemented it and it is stated in the 2019 Social Impact Monitoring and Management Program Report.

The results of the implementation are reviewed periodically once a year and during the implementation of the activity program with the aim of checking whether the activities are running according to the plan and the resources that are set out to be issued have reached the target effectively. The review was carried out in a participatory manner by involving the beneficiaries, namely local residents.

	Status: Comply	
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3.5
A system for managing human resources is in place.

3.5.1; 3.5.2.

The company has a SOP of Recruitment and Selection No. SOP/HRD/01 dated 24 December 2017 which explains the determination of qualifications, recruitment procedures, determination of acceptance, registration and placement,

orientation period and reporting and evaluation. In the SOP also stated related to age requirements, equal employment opportunities for all candidates, and no discrimination (based on ethnicity, religion, race and gender).

The company shows the employee recruitment documentation, for example starting from a job application letter, health inspection letter, up to the employment agreement. For example, documentation for mill POM 1 employee with the initials S includes a job application letter, copy of identity card, a health certificate, and a work agreement No. BPNHL-SPK/KTK-200204-C valid from February 24 2020 to February 23 2021 as kernel bagging mill POM 1. The agreement explains about placement and assignment, rights and obligations, rules, insurance, termination of employment, and other matters.

The company has SOP *Penilaian Karyawan* (SOP/HRD/05, 12 December 2017) which regulates the description of procedures related to the development and determination of Job Appraisal criteria, Review of Job Appraisal Results, Follow-up on Job Appraisal, Reporting and Evaluation.

The Promotion and Demotion mechanism has also been regulated in Article 17 of the Collective Labor Agreement which contains, the company provides equal opportunities to all workers for promotion to a higher class by considering the existence of vacancies based on the achievements and abilities of workers to occupy these positions.

Example of an employee performance appraisal:

- There is a decree for the appointment of employees that explains the status of workers, for example SK no. BPHNL/SK-P/180425-A for the position of Division Assistant.
- There are examples of employee performance assessment results for Estate A. The aspects assessed are the quality of work quality, quantity of work quality, reliability, attitude, initiative, craft and presence as well as potential for progress and development.

Based on the explanation, company has implemented the recruitment based on procedure.

Status: Comply

3.6

An Occupational Health and Safety (H&S) plan is documented, effectively communicated and implemented.

3.6.1

In carrying out its operational activities, the company has established a OHS Policy which was signed by the President Director through the Decree of the Board of Directors No. BIA / DIR / 23/170417 and ratified on 27 April 2017. The OHS policy has been socialized to all employees. The last periodic outreach was carried out on 5 April 2019 for new recruits. In addition, to facilitate socialization of the company's OHS policy, the OHS policy is posted on a notice board in every plantation office and mill.

In supporting the above policy, the company has established several procedures related to OHS. In addition, the Company has also carried out Hazard Identification and Risk Control listed in the HIRAC document which was reviewed on 28 July 2020 by the P2K3 management, according to the results of identification carried out and annual evaluation, there are several additional hazard identification and risk control in several operational activities such as work in the Hazardous Waste Warehouse, areas with high noise, places that have rotating engine parts, loading FFB activities to trucks, and several other jobs. Thus, the HIRAC document has identified all potential hazards and health (all plantation and mill operations) that may arise from operational activities and their consequences and analyses the control measures that must be taken.

3.6.2

The implementation of OHS includes the provision of Personal Protective Equipment (PPE), medical examinations, recording of work accidents and evaluation, fulfilment of OHS competencies such as first aid officers; Welder; Electric technician; Operation Permit (SIO) for Power engines and production Operators and Heavy Equipment Operators as well as operational and test permits for all Power engines and production and Heavy Equipment.

In addition, the company has also formed a P2K3 organization with a management structure consisting of a Chairman, Deputy Chairperson, Secretary and other divisions. The function of the P2K3 organization is to plan, supervise, develop and implement OHS within the scope of the certification unit. The P2K3 committee has been approved by the Merauke

Regency Manpower and Transmigration Office in accordance with Decree No. 05 / P2K3 / IX / 2018 dated 18 September 2018 and has a P2K3 secretary who is a General OHS Expert who has a Decree of Appointment from the Minister of Manpower with No. 10016 / NAKER-BINWASK3 / XI / 2017 dated 27 November 2017 which is valid until 27 November 2020.

In conducting evaluation and monitoring related to the implementation of OHS in the company, the P2K3 organization conducts regular meetings every month to ensure that the implementation of OHS runs properly.

Status: Comply

3.7

All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.

3.7.1

The company has training program year 2020 for employees at estate, mill, plasma and contractors, for example:

- Training for boiler operator
- Training of OHS at mill and estate
- Training and socialization of harvest activities
- Training of defensive driving
- SCCS training
- MSDS training
- Chemical handling training

3.7.2

The company shows a list of training realization in that were attended by estate, mill, smallholders and contractor employees, such as :

- Harvest training on March 17, 2020 at division 1 plasma. Attended by 15 workers (include contractor employees)
- Detailed harvest inspection training on March 5, 2020 at estate A division 2. Attended by 24 people
- OHS training on September 15-16 2020 at POM 1. Attended by 15 workers
- Leaf sampling training on September 1, 2020 at estate A. Attended by 6 people from estate A and 2 people from the plasma.

Based on interview with contractor, they inform that company already socialized the OHS procedure, first aid, child worker and risk for women workers.

3.7.3.

Unit management demonstrated the supply chain training which was held on October 10, 2020, attended by 6 participants (security, weighbridge operators and grading operators). Photo documentation and attendance list. The material explained is introduction of the SCCS RSPO model starting from the identity preserved supply chain, segregated supply chain, mass balance supply chain, book and claim supply chain. SCCS training is carried out by training institutions with trainers who have competence as SCCS Lead Auditors

Based on interview with security and weighbridge operators, they have been given training on understanding supply chain. Workers know the separates between own plantation and outside FFB of the company. The trainer is sustainability staff from head office who already pass RSPO Lead Auditor Training Courses and SCCS Training by RSPO training provider.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2.

Based on interviews with management representatives and field observation, POM 1 will apply the mass balance (E) module. The company receives fruit from the own estate. POM 1 receives fruit from Estate A, Plasma Division 1 and other sources (PT Cahaya Bone Lestari & PT Internusa Jaya).

3.8.3.

The estimate volume of palm oil products will determine at initial assessment. The record of actual tonnage produced will be verify further at ASA-1 after the mill has certified.

3.8.4.

Unit management already has an RSPO Membership 1-0257-18-000-00 dated July 27, 2018 and has registered with the Palm Trave IT Platform with membership number RSPO_PO1000010735.

3.8.5.

RSPO Supply Chain SOP with document number SOP / PKS / 14 effective date 26 September 2020 revision 00. The scope of activities of the relevant elements and the production and distribution chain in question are Palm Oil Mill and Bulking. Applied to the Supply Chain Model Mass Balance (MB). With the aim to explain in general about the requirements regarding traceability and Mass Balance (MB) balance.

This procedure informs the duties and responsibilities of the Sustainability Department, Marketing Department, mill traceability, FFB traceability, use of palm trace, handling of non-conformities or complaints including training that includes training plans, target participants, training conducted once a year and training materials.

Unit management shows the procedure for Purchasing and Selling of FFB / CPO / PK with document number SOP / PKS / 13, effective date of September 25, 2020 revision of 00. SOP for purchasing and selling FFB / CPO / PK is prepared to regulate the entire process of buying and selling of Fresh Fruit Bunches (FFB), Crude Palm Oil (CPO), Palm Kernel (PK), so that it can run effectively and efficiently. As well as being a guideline and uniform implementation of the process of buying and selling FFB, CPO, PK.

Unit management shows the Record Management procedure with the number SOP / DCO // 03 dated on August 20, 2020 revision 01. This procedure includes, making records, determining the record keeping period of at least 3 years, maintaining & storing, destroying and reporting and evaluating the effectiveness of record management activities.

3.8.6.

Quality Audit Procedure with code SOP / DCO / 07 effective date May 30 2020 revision 00. This SOP regulates the procedures for quality audit activities starting from planning, implementation, reporting and follow-up on quality audits. The frequency of audits is determined by the General Manager based on the audit results and is carried out at least once a year.

Unit management has carried out an internal supply chain audit on August 18-22, 2020, it is known that there are 4 non-conformities regarding the supply chain such as there is no supply chain procedure and its handling mechanism, there is no list of contractors, especially for contractors who handle chain supply products, there is no potential for calculating CPO production and certified PK and there has not been an internal supply chain audit.

3.8.7.

RSPO Supply Chain SOP with document number SOP / PKS / 14 effective date September 26, 2020 revision 00. At point 6.5 handling of non-conformities or complaints. The record of actual tonnage produced will be verify further at ASA-1 after the mill has certified. Currently there is no over production because the product has not been declared certified.

3.8.8

The mill has no certified yet. The minimum information for RSPO certified products on sales will be verify at annual surveillance audit.

3.8.9; 3.8.10 & 3.8.11.

The results of interviews with management representatives (Security, weighbridge operators and others) show that the company does not have cooperation with third parties in handling certified products. Vehicles and bulking owned by PT Bio Inti Agrindo.

3.8.12.

Unit management has not certified yet, so the records of certified products will be verified at annual surveillance audit. The records of supply chain shall maintain accurate, complete, up-to-date and accessible covering all aspects of these RSPO Supply Chain Certification Standard requirements. Retention times for all records and reports shall be a minimum

of two (2) years and the site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis or three-monthly basis. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)

3.8.13 & 3.8.14.

Unit management has not certified yet and the site doesn't apply a conversion rate.

3.8.15.

Based on interviews with management representatives and field observation, POM 1 will apply the mass balance (E) module. The company receives fruit from the own estate. POM 1 receives fruit from Estate A and Plasma Division 1 and other sources (PT Cahaya Bone Lestari & PT Internusa Jaya).

3.8.16.

Unit management has not certified yet, so there is no transaction or claim that registered in RSPO IT Platform. This matter will be verified further at annual surveillance audit.

3.8.17.

Unit management has not certified yet, so there is no transaction or claim that registered in RSPO IT Platform. This matter will be verified further at annual surveillance audit.

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.

4.1.1

The company has a policy on Respecting Human Rights in document No. BIA/DIR/27/190225 which was endorsed by the President Director on February 25, 2020. The policy states that PT BIA will avoid violations of human rights, prevent violence against human rights, protect defenders and reporters of human right violation, and comply with laws and regulations that apply in the Republic of Indonesia. Based on interview with workers, they know and understand the policy.

4.1.2

The company is indirectly hires and employs security which come from and represented as Indonesia National Soldier (TNI) to guard national boundaries. The scope of work is based on decree No. Sprin/39/VIII/2019. The unit of certification was undirectly hires and employ the national soldier. Based on interview with worker at Estate A, there were no issues related to violence perpetrated by mercenaries from PT BIA.

Status: Comply

4.2

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

4.2.1

The company has a complaint handling SOP document No. SOP/SOS/04 revision 1 dated 20 July 2020. The SOP explains that in receiving and recording complaints and dissatisfaction, the company guarantees the anonymity of whistleblowers. Complaints are submitted to the PR department in person, by telephone, email, facsimile and suggestion box. Results of interviews with workers and communities, show that they are know the mechanism for submitting complaints. All parties have been agreed and aware regarding to complaint mechanism.

4.2.2

The company has disseminated the company policy, including the complaint mechanism. For those who cannot read and write, complaints can be submitted directly. Results of interviews with workers in the estate and mill show that they know the mechanism for submitting complaints. Company can provide socialization evidence of complaint procedures such as in Estate A on 18 April 2020 attend by workers and in 11 & 13 April 2020 attend by communities (head of village and

scheme smallholder). Results of interviews with workers and communities, show that they know the mechanism for submitting complaints. All parties have been agreed and aware regarding to complaint mechanism.

4.2.3

Unit management shows the SOP for Handling Complaints and Dissatisfaction (No. SOP/SOS/04 revision 1 dated 20 July 2020) as a reference for all employees in handling any complaints and dissatisfaction both originating from internal and external stakeholders related to the company, in accordance with the laws and regulations applies. There is PIC for complaints and dissatisfaction consist of Manager Department, Public relation Staff & Manager.

News articles in February 2020 by Pusaka (civil society organizations to conduct research and policy advocacy, promoting and defending the rights of indigenous peoples). At the end of December 2019, residents of *Kampung Selil*, Uililin District, Merauke Regency. Finding the Yawontop Sacred Forest (sacred and protected place of the Malind and Wambon Tekamerop tribes) has been lost and damaged. It is known that the company operator PT BIA has carried out the eviction of sacred forest (HCV area) located in the HCV area of Division II Estate A. It is known that this was due to an order from the Division II foreman to carry out cleaning in the watershed area from blocks 2-19 to 2- 25 in sacred forest locations.

This incident caused losses to the community, including the loss of opportunities and disruption of the relations of the local indigenous people to carry out rituals and spiritual relationships. They worry that the damage and loss of sacred places will bring disaster to human life.

The company has documented complaints from the community and resolved complaints, with the following details.

- There is an official report of the demolition of the HCV area in block 2.24, Division 2, dated on December 19, 2019 regarding the chronology of demolition of the area. At that time, the excavator operator did not receive instructions from the foreman because the foreman was on annual leave and another foreman was helping harvest activities in Division 5.
- There is guilty plea letter from the excavator operator dated January 4, 2019.
- There is a report on the settlement of sacred land in the area, such as:
 - January 10, 2020, the customary fine for the sacred land of Marga Basik-Basik at Estate A.
 - January 10, 2020, the payment for *Tua adat* in the process of resolving the sacred land problem of Marga Basik-Basik.
 - 11 January 2020, additional compensation for the sacred land of Marga Basik-Basik Estate A.
- There is evidence of handover of additional compensation funds for sacred land block 2-24 Estate A to the *Tua Adat* of Marga Basik-Basik on January 11, 2020 as well as a statement letter of Marga Basik-Basik position regarding this matter, declaring himself a representative of the Marga and firmly accepting apologies from the management of PT BIO.
- There is a letter of clarification regarding the news by the Yayasan Pusaka Bentala Rakyat on January 16, 2020, inviting the Pusaka Bentala Rakyat Foundation and Linus Omba.
- There is an official report Number February 20, 2020 regarding a meeting with the parties for the restoration and rehabilitation of the HCV area in Estate A. Participants who attended, Head of Marga Basik-Basik, Chairperson of the Uililin District LMA, Head of PT BIO, Environmental Agency Merauke Regency, Santo Antonius Merauke Foundation and *BBKSDA* Papua.

Field observations in the riparian Area block 2-24 Division II. The area has been rehabilitated, There has been planting of local plants and the riparian conditions have been left. There is information regarding the HCV area and there is an information board prohibiting destroying the area.

4.2.4

Unit management shows the SOP for Handling Complaints and Dissatisfaction with the number SOP / SOS / 04 dated July 20, 2020 as a reference for all employees in handling any complaints and dissatisfaction both originating from internal and external stakeholders related to the company, in accordance with the laws and regulations applies. There is PIC for complaint and dissatisfaction consist of Manager Department, Public relation Staff & Manager. Results of interviews with workers and communities, show that they are know the mechanism for submitting complaints. All parties have been agreed and aware regarding to complaint mechanism.

	Status: Comply	
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.		
4.3.1		
<p>The company held meetings with stakeholders including representatives of surrounding villages in the context of monitoring the management of social impacts in the PT. BIA on 10 December 2019. The results of the meetings were used as reference for social management programs in the communal owners, stakeholders and the communities around company.</p> <p>CSR Program of PT BIA can be broadly classified into four categories, namely education, health, social and economic empowerment of the ulayat owners. The four categories are developed into superior programs that are tailored to the potential and needs of the community.</p> <p>Some of the programs that have been implemented such as rice subsidies to customary owners on 22 July 2020, scholarship and other tuition assistance to children of customary owners on 26 August 2020, construction of a drilling well in Sellil Village on 17 August 2020, grief assistance on 28 August 2020, religious assistance on 29 August 2020, and other social assistance.</p>		
	Status: Comply	
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their Free, Prior and Informed Consent (FPIC).		
4.4.1.		
<p>The company for scope PT. Bio Inti Agrindo - POM 1 has managed totaling area of 6,666.90 Ha, which consist of 6,170.84 Ha for core estate and 496.06 Ha for plasma. The corporate area originates from conversion production forest area that has been released through decree of forestry ministry No. 572/Menhut-II/2009 dated 28 September 2009 for an area of 36,400.90 Ha. The next process is land acquisition from customary land by providing compensation that conducted since 2007 to 2015. The company get the land use title for 6,666.90 Ha in the form of HGU decree from head of national land agency No. 81/HGU/BPN RI/2011 dated 15 December 2011.</p>		
4.4.2		
<p>The company's area gets from customary land that have been compensated through FPIC process with the community leader. The compensation process is not diminishing the legal/customary right and the land acquisition been through without coercion. Records of land acquisition, such as the Declaration Letter for the Release of the Customary Land Rights of the Omba Clan in Asiki Village, Jair District, Boven Digoel Regency on May 30, 2011 which was signed by both parties.</p>		
4.4.3		
<p>The company can show a map showing legal rights in the form of a HGU boundary map with a scale of 1: 30,000 contained in the HGU certificate issued by the Land Office. Based on public consultation with previous land owner and village representatives, it is recognized that they know the legal boundaries owned by PT BIA. Map of land measurement when land acquisition is made in a participatory manner involving customary parties</p>		
4.4.4		
<p>Records of land acquisition, such as the Declaration Letter for the Release of the Customary Land Rights of the Omba Clan in Asiki Village, Jair District, Boven Digoel Regency on May 30, 2011 which was signed by both parties. Records and information related to the Declaration of Release of Rights to Customary Land, Minutes of Payment of Traditional Ritual Funds, Statement of Clan Agreements, and others are available in an appropriate forms and language.</p>		
4.4.5		
<p>Based on interview with previous land owner (Head of village & Secretary Mandekman village); <i>Marga Mahuze Kewam (Kecamatan Muting)</i>, <i>Marga Mahie Milafo (Desa Kindiki)</i>, known that all land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.</p>		

<p>4.4.6</p> <p>Implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties, it can be seen in the report on SIA management and monitoring for 2019/2020. The results of the implementation are reviewed periodically once a year and during the implementation of the activity program with the aim of checking whether the activities are running according to the plan and the resources that are set out to be issued have reached the target effectively. The review was carried out in a participatory manner by involving the beneficiaries, namely local residents.</p>	<p>Status: Comply</p>
<p>4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>	
<p>4.5.1, 4.5.2, 4.5.3, 4.5.4, 4.5.5, 4.5.6, 4.5.7 & 4.5.8</p> <p>There are no new plantings after 2018 in the managed area, but there is new planting after 1 January 2010 without NPP and this become object of sanction for 3 years. The planting year of 2018 and 2019 is insertion not new planting. The compensation process has been finished in 2015 and not diminishing the legal/customary right and the land acquisition been through without coercion. Based on interview with previous land owner (Head of village & Secretary Mandekman village); <i>Marga Mahuze Kewam (Kecamatan Muting)</i>, <i>Marga Mahie Milafo (Desa Kindiki)</i>, the land has been compensated and there is no claim/ dispute land between community and the company.</p>	
<p>Status: Comply</p>	
<p>4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>	
<p>4.6.1</p> <p>Procedure for the application of Free Prior and Informed Decision (FPIC) with number SOP/DCO/08 dated September 21, 2020. This SOP covers all activities for implementing the free prior and informed decision process within the scope of the company. This SOP informs scoping, implementation of FPIC, reporting and evaluation. This procedure explain about identification of landowner, mapping, consultation with community, negotiation & payment, record of collective agreement.</p> <p>The Public Relations Department and the FPIC Implementation Team are responsible for conducting field studies with in-depth interviews and consultation with the community through Focus Group Discussions (FGD) as well as special meetings with community groups as well as collecting relevant document data. The main issues that the study carried out in the scoping stage.</p> <p>The implementation of FPIC consists of submitting information on the implementation team's visit to related agencies, preliminary studies, meetings with government agencies and indigenous peoples' institutions, initial socialization of development plans (preparation of socialization, implementation of initial socialization of development plans, public consultations, negotiations and collective agreement, finalization & ratification of collective agreements).</p>	
<p>4.6.2</p> <p>The negotiations of compensation for customary land are dealt with procedure of land acquisition SOP/SOS/01 dated 24 December 2017. The procedure enables the indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>	
<p>4.6.3</p> <p>Based on interviews with the previous landowner owner (Head of village & Secretary Mandekman village); <i>Marga Mahuze Kewam (Kecamatan Muting)</i>, <i>Marga Mahie Milafo (Desa Kindiki)</i>, land compensation has been paid by the company with mutual and equal agreements for men and women for the payment of the land.</p>	
<p>4.6.4</p> <p>The process and outcomes of all agreements, compensation and payments resulting from negotiations are fully documented with evidence of the participation of affected parties and made available to these parties. For example,</p>	

records of land acquisition such as the Declaration Letter for the Release of the Customary Land Rights of the Omba Clan in Asiki Village, Jair District, Boven Digoel Regency on May 30, 2011 which was signed by both parties, Minutes of Payment of Traditional Ritual Funds, Statement of Clan Agreements, and others.

Based on interview with previous land owner (Head of village & Secretary Mandekman village); *Marga Mahuze Kewam (Kecamatan Muting)*, *Marga Mahie Milafo (Desa Kindiki)*, known that all land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved and they hold the copy all of compensation documents.

Status: Comply

4.7 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.

4.7.1
 Procedure for the application of Free Prior and Informed Decision (FPIC) with number SOP/DCO/08 dated September 21, 2020. This SOP covers all activities for implementing the free prior and informed decision process within the scope of the company. This SOP informs scoping, implementation of FPIC, reporting and evaluation. This procedure explain about identification of landowner, mapping, consultation with community, negotiation & payment, record of collective agreement.

4.7.2
 Based on interviews with the previous landowner owner (Head of village & Secretary Mandekman village); *Marga Mahuze Kewam (Kecamatan Muting)*, *Marga Mahie Milafo (Desa Kindiki)*, land compensation has been paid by the company with mutual and equal agreements for men and women for the payment of the land. Beside compensation in monetary, company also provide plasma to communities. The represent parties who represent the land acquisition is head of clan which choosing by communities with evidence power of attorney from communities to head of clan.

4.7.3
 Based on compensation document known that customary land has been compensated through FPIC process. Interviews with the previous landowner owner (Head of village & Secretary Mandekman village); *Marga Mahuze Kewam (Kecamatan Muting)*, *Marga Mahie Milafo (Desa Kindiki)*, land compensation has been paid by the company with mutual and equal agreements, and the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as smallholders scheme and other benefit in the form of CSR program.

Status: Comply

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

4.8.1, 4.8.2, 4.8.3 & 4.8.4
 Based on any document verification and interview with the management it known that there is no land dispute in the managed area.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.

5.1.1
 The company has a SOP for determining FFB prices with the code: SOP / POM / 01 dated December 24, 2017. The SOP aims to determine the purchase price of FFB from other companies' plantations. The purchase price for FFB will be determined monthly using an agreed formula between PT BIA and other FFB source companies.

Whereas the determination of prices for smallholders, based on the agreed agreements, is based on prices issued by the Plantation Office. Every time a FFB price-setting meeting is held in the Regional Government, the company always includes representatives from the Cooperative so that farmers through the cooperative management can directly know the price set by the Regional Government. Based on interview with plasma, the current and previous prices for FFB are

accessible to smallholder but until the audit conducted plasma plantation is not mature.

The current FFB price and the previous period can be shown by management, and can be accessed publicly by scheme smallholders and independent smallholders. The FFB price for scheme smallholders refers to the FFB price set by the Plantation Office. Meanwhile, for third parties or independent smallholders, it refers to the company's internal price which is announced through the group network or displayed in front of the Mill.

5.1.2

The company has a cooperation agreement in the development of community gardens with the Mandob Sejahtera Cooperative as indicated in the letter of cooperation agreement No. 001 / BIA-KPPSMS / SPK / IX / 2016 located in Kampung Mandekman Ulilin District, Merauke Regency dated September 23, 2016 which is valid for 30 years covering ± 5,440 Ha (20% of the effective area of the plantation) The agreement is known by the local Regional Government namely the Head Forestry and Plantation Office, Head of Cooperative Office, Ulilin District Head and approved by the Merauke Regent The determination of potential partnership partners based on the Merauke Regent Decree No. 522.1 / 523 / year 2016 concerning the determination of CPCL participants of community oil palm plasma and primary KSU Mandob Sejahtera oil palm plantations in Ulilin District and Muting District. Merauke with 274 farmers dated 26 September 2016.

To determine the price of FFB for farmers, it has been agreed in the agreement between the plasma cooperative "Mandob Sejahtera and PT. Bio Inti Agrindo, that for the determination of the price of FFB for plasma farmers in accordance with the provisions contained in the regulation of the Minister of Agriculture on the guidelines for determining the purchase price of oil palm fresh fruit bunches (FFB). This was also proven by the company by always involving representatives from plasma cooperatives at the FFB price-setting meeting by the Regional Government. To establish communication between the company and plasma farmers, plasma cooperatives are always held once a week (minutes of the last meeting on October, 2020).

Based on the results of interviews with Chairman of the Plasma Cooperative Division 1 and owner of customary rights Mandok Sejahtera Plantation Cooperative (KPPSMS), it was stated that the management unit had informed farmers about the price of FFB.

5.1.3

The company has a SOP for determining FFB prices with the code: SOP / POM / 01 dated December 24, 2017. The SOP aims to determine the purchase price of FFB from other companies' plantations. The purchase price of FFB will be determined every month by using an agreed formula between PT BIA and other FFB source companies.

In the Cooperation Agreement Letter No. 001 / BIA-KPPSMS / SPK / IX / 2016 which contains a cooperation agreement in the development of community with the Mandob Sejahtera Cooperative in article 8 paragraphs 2.2 and 2.3 explained related to net income that will be received after being reduced by costs, including plant maintenance costs, oil palm harvesting costs and transportation costs and a management fee of 5% and also net income is then used to pay interest and loan principal installments to the Bank.

5.1.4

The company has a cooperation agreement in the development of community with the Mandob Sejahtera Cooperative as indicated in the letter of cooperation agreement No. 001 / BIA-KPPSMS / SPK / IX / 2016 located in Kampung Mandekman Ulilin District, Merauke Regency dated September 23, 2016 which is valid for 30 years covering ± 5,440 Ha (20% of the effective area of the plantation) The agreement is known by the local Regional Government namely the Head Forestry and Plantation Office, Head of Cooperative Office, Ulilin District Head and approved by the Merauke Regent The determination of potential partnership partners based on the Merauke Regent Decree No. 522.1 / 523 / year 2016 concerning the determination of CPCL participants of community oil palm plasma and primary KSU Mandob Sejahtera oil palm plantations in Ulilin District and Muting District. Merauke with 274 farmers dated 26 September 2016.

In the Cooperation Agreement Letter No. 001 / BIA-KPPSMS / SPK / IX / 2016 which contains a cooperation agreement in the construction of community with the Mandob Sejahtera Cooperative in paragraphs 2.2 and paragraph 2.3 explains as follows:

- The net income of the first party (cooperative) is the result of the production of oil palm FFB reduced by costs,

including plant maintenance costs, harvest costs and transport costs of oil palm FFB, a management fee of 5%. If there are other costs beyond the above provisions, then the second party is authorized (company) to charge these fees to income from the sale of oil palm FFB, with the knowledge of the first party.

- The net income referred to in paragraph 2.2 of this article is then used for the payment of the principal installment interest to the Bank, obligations to the second party, and the remainder (if any) for the first party
- The management system is fully managed by PT BIA. The list of people who get a share is determined by the decision of the Merauke District.

5.1.5

The company has a cooperation agreement in the construction of community estate with the Mandob Sejahtera Cooperative as indicated in the cooperation agreement No. 001 / BIA-KPPSMS / SPK / IX / 2016 located in Kampung Mandekman Ulilin District, Merauke Regency dated September 23, 2016 which is valid for 30 years covering ± 5,440 Ha (20% of the effective area of the plantation) The agreement is known by the local Regional Government namely the Head Forestry and Plantation Office, Head of Cooperative Office, Ulilin District Head and approved by the Merauke Regent Where for the cooperative that signed the SPK is the Chairperson's Power of Attorney, Deputy Chairperson, Secretary I, Secretary II and Treasurer, while from PT. Bio Inti Agrindo was represented by the President Director of PT. Bio Inti Agrindo.

Based on the results of interviews with Chairman of the Plasma Cooperative Division 1, the contracts are made fairly, in accordance with applicable law, transparent, and have an agreed term.

5.1.6

In the cooperation agreement in the construction of community estate with the Mandob Sejahtera Cooperative shown in the cooperation agreement No. 001 / BIA-KPPSMS / SPK / IX / 2016, there is an agreement regarding the profit sharing payment, that is in article 9 (Obligations and Rights of the Parties) paragraph 1.16 which states that the First Party (cooperative) shares the net income received from the second party (company) every month to members that have been determined.

The company can show proof of profit sharing payments to farmers with a prior agreed list of recipients for the results and the amount of money to be paid between the company and the cooperative. Payments are made via direct transfer to each farmer's account in accordance with the recap signed by the cooperative.

5.1.7

The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by a third party. The certification unit has also shown documents on the weighbridge calibration carried out in 9 October 2020 by legal metrology department Merauke.

5.1.8

The management of the plasma area is fully carried out by the company, so directly for plasma will be included in the scope of certification. The company has a cooperation agreement in the construction of community estate with the Mandob Sejahtera Cooperative as indicated in the cooperation agreement No. 001 / BIA-KPPSMS / SPK / IX / 2016 located in Kampung Mandekman Ulilin District, Merauke Regency dated September 23, 2016 which is valid for 30 years covering ± 5,440 Ha (20% of the effective area of the plantation).

5.1.9

Unit management shows the SOP for Handling Complaints and Dissatisfaction with the number SOP / SOS / 04 dated July 20, 2020 as a reference for all employees in handling any complaints and dissatisfaction both originating from internal and external stakeholders related to the company, in accordance with the laws and regulations applies. There is PIC for complaints and dissatisfaction consist of Manager Department, Public relation Staff & Manager. The procedure has explained that the response to dissatisfaction or complaints is carried out no later than 30 days after receiving the report.

Status: Comply	
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5.2
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.

5.2.1
 The company has a cooperation agreement in the development of community gardens with the Mandob Sejahtera Cooperative as indicated in the letter of cooperation agreement No. 001 / BIA-KPPSMS / SPK / IX / 2016 located in Kampung Mandekman Ulilin District, Merauke Regency dated September 23, 2016 which is valid for 30 years covering ± 5,440 Ha (20% of the effective area of the plantation) The agreement is known by the local Regional Government namely the Head Forestry and Plantation Office, Head of Cooperative Office, Ulilin District Head and approved by the Merauke Regent The determination of potential partnership partners based on the Merauke Regent Decree No. 522.1 / 523 / year 2016 concerning the determination of CPCL participants of community oil palm plasma and primary KSU Mandob Sejahtera oil palm plantations in Ulilin District and Muting District. Merauke with 274 farmers dated 26 September 2016.

The management of the plasma area is fully carried out by the company, so directly for plasma will be included in the scope of certification.

5.2.2
 The management of the plasma area is fully carried out by the company, then the certification unit automatically develops and implements livelihood improvement programs, including at least capacity building to increase productivity, quality, organizational and managerial capabilities, as well as certain elements in RSPO certification.

5.2.3
 The management of the plasma area is fully carried out by the company, and PT BIA does not accept FFB from independent smallholders.

5.2.4
 The management of the plasma area is fully carried out by the company, so the pesticide handling training is carried out together with the workers own estates.

5.2.5
 The company's efforts in conducting public reviews and reporting on the development of support programs on a regular basis, always holding a meeting between the company and smallholders once a week. PT Bio Inti Agrindo Plantation Business Development Report, July-December 2019 Period and Report Evidence to the Horticulture and Plantation Office of Merauke Regency, January 14, 2020.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1
Any form of discrimination is prohibited.

6.1.1
 The company has a No-Discrimination Policy at Work which is stipulated in the Decree of the Board of Directors No. BIA/DIR/13/1771221 dated December 22, 2017. The decree contains the company's commitment to ensure that there is no discrimination occur within the company by means of:

1. Comply with all applicable laws and regulations.
2. Provide equal opportunities and opportunities to all employees and other communities regardless of ethnicity, religion, race and gender of a person.
3. Ensure that the entire management and operational processes of the company do not rely on characteristics such as race, religion and ethnicity and gender.
4. Ensure that there will be no discrimination in terms of salary structure, employee recruitment, position and promotion as well as general working conditions.

The company has a SOP of Recruitment and Selection No. SOP/HRD/01 dated 24 December 2017 which explains the

determination of qualifications, recruitment procedures, determination of acceptance, registration and placement, orientation period and reporting and evaluation. In the SOP also stated related to age requirements, equal employment opportunities for all candidates, and no discrimination (based on ethnicity, religion, race and gender).

6.1.2

Based on list of company employees for September 2020, it is known that the company's employees come from different ethnics, religious, and educational backgrounds. It is known that there are local communities and female workers.

6.1.3

The company shows the example of employee recruitment documentation for mill POM 1, such as a job application letter, copy of identity card, a health certificate, and a work agreement for employee with the initials S No. BPNHL-SPK/KTK-200204-C valid from February 24 2020 to February 3 2021 as kernel bagging. The agreement explains about placement and assignment, rights and obligations, rules, insurance, termination of employment, and other matters.

The company also shows a sample of promotional document such as SK No BPNHL/SK-P/201015-A which mention that employee with the initials YM have been appointed as permanent employees of Estate A division 3 since October 16, 2020. The letter is accompanied by an employee performance appraisal form.

6.1.4

Based on interviews with the company, the company did not perform a pregnancy test at the time of employee recruitment. Pregnancy checks are only carried out on spray and fertilizer workers every month to find out whether the spray worker is pregnant or not. Pregnancy examinations are only carried out for female workers who do not use contraceptives. For workers who are pregnant, the company still employs them and is placed in a light work area and does not have a high risk of hazards such as contact with chemicals, lifting heavy items, and so on.

6.1.5

The company has formed a gender committee of PT Bio Inti Agrindo with specific objectives to raise awareness, identify and address issues of concern, and provide opportunities and advancement for women. The gender committee has an outreach program for female workers on sexual harassment, family planning and child protection. Until the audit was held, the company was still socializing the gender committee because there were still many employees in division who did not know the existence of the gender committee.

6.1.6

The company shows a copy of the Governor's decree No. 188.4/369/2019 regarding sectoral minimum wage for Papua Province 2020 dated November 25, 2019. The document informs that the Papua UMP in 2019 is Rp 3,516,700. Then the company showed a salary slip for harvester Estate A division 1 with ID 00/00EA/0219/999 and harvester Estate A division 3 No ID 00/00EA/0220/1165 who earned a basic salary of Rp 3,516,700.

	Status: Comply	
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6.2
Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).

6.2.1

The company has a collective labor agreement (PKB) 2019-2021 that explain about the rights and obligations of workers and companies, industrial relations, wages and BPJS, working days, leave and permits, company rules, OHS, provisions for layoffs. In article 20 explained that wages for workers are adjusted to agreement between employers and workers when they are accepted to work with details of wages components divided into 2 (two) major parts as follows :

1. Basic wage or basic salary is the wage in its initial determination no less than the district minimum wage (UMK) set by the government.
2. Allowances consist of fix allowance and non-permanent allowances.

6.2.2

The company shows work agreement (SPK) and employee salary slip, such as for harvester estate A with ID 00/00EA/0129/ SPK No. BPNHL-SPK/KTK-010220-U and salary slip periode September 2020. The employee receives a

basic wage of IDR 3,516,700. The agreement explains about placement and assignment, rights and obligations, rules, insurance, termination of employment, and other matters. Where as on salary slip there are details about overtime payment, employee deductions such as BPJS labor for pension and old-age benefits, SPSI deductions, meal deductions, and cafeteria deductions

6.2.3

The company has *Perjanjian Kerja Bersama (PKB)* for the period 2019-2021 which was prepared and approved by the Management of PT Bio Inti Agrindo with the Worker Union and ratified by the Head of the Merauke Regency Manpower and Transmigration Office on August 6, 2019 and is valid for three (3) years. The PKB also explains about Rights, Obligations, Industrial Relations, Worker Status, Wages, Dependents and Positions, Wage Increases, Working Days, Working Hours, Social Security/Welfare (BPJS), Overtime, Maternity/Maternity Leave, Protection, Equipment, Occupational Safety and Health, etc.

Certificate holder has demonstrated evidence of legal compliance related to employment, such as:

- Wages according to government regulations
- Based on interview with female worker who get menstrual leave and maternity leave, informed that worker was paid in accordance with their basic wage and allowance.
- The company shows salary slip and attendance of employee period September 2020, such as for mill employee with ID 00/00M1/0419/127 did 72 hours of overtime, so that the overtime wages earned is IDR Rp 2.652.758

Based on these explanations, it can be concluded that the certification unit has carried out work requirements in accordance with applicable laws and regulations in Indonesia.

6.2.4

The company has provided facilities for workers such as housing, school, clinic, daycare, mosque/chapel, market, public toilet and sports facilities. The source of electricity and water for housing come from generator and drilling well.

6.2.5

The company provides access for grocery sellers to enter the company area. However during the Covid-19 pandemic, buying and selling transactions were carried out at the company's entry portal. There are also cooperative and market that provide food and goods for employees.

6.2.6

The company has applied a minimum wage of IDR 3,516,700 which has been determined based on the Governor's Decree No. 188.4/369/2019 concerning the sectoral minimum wage for Papua Province 2020 dated 25 November 2019.

The company also shows PT BIA's 2020 living wage calculation. Based on this calculation, the prevailing wage received by workers is IDR 3,255,000 with in kind benefits received by workers of IDR 1,120,400 (food and housing) and a base wage of IDR 3,516,700. This shows that the company has provided a decent living wage to its workers.

6.2.7

Based on the results of interviews with workers at mill, estate and plasma, it was found that there are workers with contract status. Result of company employee list document review period September 2020, it is known that there are 37 contract employees for operational work at POM 1 and 245 contract employees for harvesting at Estate A.

Decree of the Central Management of the Indonesian Palm Oil Association No. SK / 002 / PPG / II / 2013 dated February 8, 2013 concerning the Activity Flow of the main work implementation process in the Palm Oil Plantation Business Sector states that the main activities of the plantation business sector are the Activities of Harvesting and Processing FFB into CPO.

Therefore, the company has not been able to ensure that the core work is carried out by employees who have permanent and full-time work positions in accordance with applicable regulations. This is a **nonconformity No. 2020.02 with non-critical categories.**

6.2.7	Status: Non-conformity No. 2020.02 with Non-critical criteria.	
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.		
6.3.1 The company has a Freedom of Association Policy stated in the Decree of the Board of Directors No: BIA/DIR/ 11/171221. In the policy stated that PT BIA supports the freedom of every worker to associate to gather and express opinions by providing opportunities: <ul style="list-style-type: none"> • Form worker unions in accordance with applicable and responsible legislation and give freedom to worker unions to protect workers' rights and interests and improve the welfare of workers and their family members • Giving freedom or dispensation to all Management of Worker Unions in carrying out union activities such as dispensation to attend conferences / deliberations, dispensation to attend worker union seminars / training inside and outside the region, dispensation to fulfill government calls and dispensation for other existing needs its relationship with worker union • Form and become a management and member of a Worker Union without coercion and pressure from any party. <p>Worker union of PT BIA was formed in 2014 and has registered to Manpower and Transmigration Agency of Merauke Regency with registration number 561/1307/2014 on September 17, 2014.</p> 6.3.2 The company shows the minutes of the meeting between the certification unit and the workers' union or worker representatives who are freely chosen by the workers in the national language, which is listed in the Minutes of the Meeting of the Workers Union of PT BIA on March 3, 2020.		
6.3.3 The results of interviews with worker union representatives, it is known that the election of the chairman is based on the voting, and union officers are chosen by the chairperson to represent each estate. The union activities are not influenced by company management. Meetings with internal parties are held when there are issues that need to be discussed.		
Status: Comply		
6.4 Children are not employed or exploited.		
6.4.1 The company has a policy on child labor as stipulated in the Decree of the Board of Directors No: BIA / DIR / 17/171221 PT BIA dated December 22, 2017 states that PT BIA believes that children are entitled to education and a healthy and decent life, for that PT BIA will not employ under age children. PT BIA will not employ children under 18 years old and will ensure that: <ol style="list-style-type: none"> 1. In the Employee Recruitment process, it will be selected as well as possible by requesting an Original Identity Card to prove the age of the prospective employee, if unable to show the document, then PT BIA has the right to reject the prospective employee 2. PT BIA will deliver and disseminate to partners who work with PT BIA regarding the prohibition of employing minors and will be an inseparable part of the work agreement 3. If a Child Labor is found later, PT BIA will take action and will be processed in accordance with applicable regulations. 6.4.2 The certification unit has a policy on Child Labor which is regulated in the Decree of the Board of Directors No: BIA/DIR/17/171221 PT BIA dated December 22, 2017 which contains, among other things, the belief that children have the right to education and a healthy and decent life, for that the company will not employing minors. <p>Based on the results of interviews with the Worker Union, it is known that the company only accepts workers aged 18 years and over and, in the field, there are no workers under 18 years of age.</p>		

6.4.3

The unit of certification does not employ young workers. Based on the results of field observations on operational activities at the Estate A, there are no young person or students who carry out field work practices in oil palm plantations.

6.4.4

The company did :

1. Socialization in estate and plasma division held in 9 September 2020 regarding PT BIA's policy which includes the prohibition of child labor which is attended by workers.
2. Put a sign on the roadside stating that under age workers are prohibited and put educational banners for children.
3. There is a clause for not allowing workers under 18 years in the work agreement with the contractor.

The result of interview with workers shows that they understand that the minimum working age is 18 years.

Status: Comply

6.5

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

6.5.1

The company has a policy on the prevention of harassment and sexual violence and other forms stipulated in the Decree of the Board of Directors No. BIA/DIR/18/171221 PT BIA dated December 22, 2017 which explain about the company's commitment to maintain the norms in the workplace.

Socialization in estate and plasma division held in 9 September 2020 regarding PT BIA's policy which includes the prevention of harassment and sexual violence which is attended by workers

The company has endeavored to implement the policy with establish of PT BIA Gender Committee in December 2017 as a forum for handling problems in the event of sexual harassment, domestic violence and efforts to protect women's rights. The gender committee has socialization programs for female workers such as about sexual harassment, family planning, child protection. There have been cases of sexual abuse of minors in 2018 and 2019. However, this case has been resolved in accordance with the applicable law.

6.5.2

The company has a policy to protect the reproductive rights of all workers, especially women in the Decree of the Board of Directors No. BIA/DIR/19/171221 PT Bio Inti Agrindo concerning the Protection of Women's Reproductive Rights signed by the President Director on 22 December 2017. The policy also mentioned that PT BIA guarantees special protection and treatment to provide equal opportunities and benefits to achieve equality in justice and respecting women's basic rights.

Socialization in estate and plasma division held in September 2020 regarding PT BIA's policy which includes to protect the reproductive rights of all workers, especially women which is attended by workers.

The implementation of the above policy is, pregnant or breastfeeding female workers were prohibited from spraying. Based on field visits and interviews with spray workers, it was found that none of the spray workers were pregnant or breastfeeding.

Pregnancy checks are only carried out on spray and fertilizer workers every month to find out whether the spray worker is pregnant or not. Pregnancy examinations are only carried out for female workers who do not use contraceptives, as for those who use contraceptives only when they feel signs of pregnancy are present. This is in accordance with applicable laws and regulations.

For workers who are pregnant, the company still employs them and is placed in a light work area and does not have a high risk of hazards such as contact with chemicals, lifting heavy items, and so on.

6.5.3

The company has identified the needs of new mothers by means of a questionnaire in each estate. Points identified

including maternal and child health programs (KIA), nutrition programs through posyandu, exclusive breastfeeding and immunization, and work implementation. The results of the questionnaire are planned to be realized in 2021.

6.5.4

The company has a complaint handling SOP document No SOP/SOS/04 revision 1 dated 20 July 2020. The SOP explained that all complaints must be documented and recorded in the complaint and dissatisfaction book and must be responded to. In receiving and recording complaints and dissatisfaction, the company guarantees the anonymity of whistleblowers. Submission of complaints directly can be submitted to the PR staff.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

Based on document review of the List of Worker for September 2020, there are no workers from overseas. The employees come from indigenous Papuans and from other tribes such as from Sumatra, Java, Sulawesi, Nusa Tenggara Barat, Nusa Tenggara Timur, Maluku, and Kalimantan. Foreign workers who work in the company serve as managers, both in mill and estates. The company shows list of foreign workers accompanied by passport number and KITAS, for example a maintenance manager from Korea has a KITAS 2C21DC000U valid until February 2, 2021. The worker accepts work voluntarily and freely. Based on interview with worker (Estate A), the company did not withhold documents (identity), substitution of work without the consent of the workforce, forced overtime, does not impose penalties if there is termination of employment and withholding wages.

6.6.2

The company has procedures related to the recruitment of AKAD (Angkatan Kerja Antar Daerah) which are included in the recruitment procedure No. SOP/HRD/01 dated December 24, 2017. The procedure has been adopted related to AKAD manpower procedures (Permenaker 39/2016) such as notifying job requirements to prospective workers, ascertaining the needs of manpower needs with actual field needs, providing SPK, work orientation, reporting manpower and supporting documents for AKAD (Angkatan Kerja Antar Daerah).

Status: Comply

6.7

The unit of certification ensures that the working environment under its control is safe and without undue risk to health.

6.7.1

The company has also formed a P2K3 organization with a management structure consisting of a Chairman, Deputy Chairperson, Secretary and other divisions. The function of the P2K3 organization is to plan, supervise, develop and implement OHS within the scope of the certification unit. The P2K3 committee has been approved by the Merauke Regency Manpower and Transmigration Office in accordance with Decree No. 05 / P2K3 / IX / 2018 dated 18 September 2018.

In the P2K3 organization a chairman, deputy chairman, secretary and members have been determined, the P2K3 secretary is also a General OHS Expert who has a Decree of Appointment from the Minister of Manpower with No. 10016 / NAKER-BINWASK3 / XI / 2017 dated 27 November 2017 which is valid until 27 November 2020. The P2K3 organization holds regular meetings every month to ensure the implementation of OHS is running properly and monitors actual issues in the current month.

Routine meetings are held to evaluate the implementation of the OHS work program, if in the evaluation results there are programs or plans that have not been implemented or are not in accordance with the planned targets, they will be continued in the next month or reviewed for realization in the programs and plans for the coming year.

6.7.2

The company has an emergency response system in Indonesia language set out in a number of procedures, as follows:

- SOP of Forest and Land Fire Control (SOP / HSE / 22, 24 December 2017, Revision 00) which explains, among others, fire risk analysis and fire hazard index, fire detection, prevention of forest and land fires, prevention of forest and land fires, efforts post disaster management, and Reporting and evaluation.

- SOP for Emergency Preparation and Management (SOP / HSE / 04, 24 December 2017, Revision 00), which aims as a guide in planning to deal with emergencies in all of PT BIA's work areas.
- SOP for First Aid on Accidents (SOP / HSE / 04, 24 December 2017, Revision 00), which explains from the identification, provision to the mechanism of first aid implementation in the company.

These SOPs are socialized to all employees through socialization and training. Based on interviews with all employees who were sampled during the audit, all employees understood the existing OHS procedures in the company.

For the first handling of accidents, the company has 33 first aid officers who have attended training through the PJK3 company PT. Liets Inspire Indonesia on 18 October 2019 and certified. Based on the field visits, it is known that first aid kits are available as required by regulation and are in a ready-to-use condition.

For every work accident that occurs, the certification unit always investigates work accidents to ascertain the root cause, evaluate improvements and preventive measures for the future. The company has a recapitulation of work accidents that occur in each unit every month.

Based on the results of the study of the document attachment II of the Minister of Manpower Number 15 of 2008 stated that the total contents of the first aid kit were 21 items. In addition, the procedure number SOP/HSE/05 dated 24-12-2017 point 2.3.6 states that the placement of the first aid kit must be in a condition that is easily accessible, clearly marked, in a visible location and easily moved if it is to be used, the type and the number of boxes is adjusted to the number of workers based on the Attachment of the Minister of Manpower No. 15 of 2008. But based on the field visits, it is known that:

1. POM 1 :

- Flashlight in first aid kit does not turn on (Security post)
 - Eye cleanser that does not have an expiration date. (Workshop)
2. Estate A does not contain scissors, tweezers and alcohol (harvest and spray work)
 3. Plasma Division 1 supervisor or foreman does not bring a first aid kit (spray and harvest work)

The company has not been able to show that the availability of first aid equipment in the workplace has referred to the applicable procedures and regulations. Based on that, this indicator becomes a **nonconformity No. 2020.03 with non critical category**

6.7.3

In providing protection to its workers in plantation and mill operational activities in accordance with the hazard identification results listed in the HIRAC, the certification unit has provided PPE free of charge to all its workers. PPE is given regularly every year and will be replaced if the PPE is damaged. Documentation of PPE distribution to all level workers, including:

- Minutes of handover of PPE in the form of helmets for 7 harvest workers on 04 February 2020.
- Minutes of handover of PPE in the form of boots for 20 harvest workers on 27 February 2020.
- Minutes of handover of PPE in the form of safety shoes for 90 mill workers on 17-18 March 2020.

Based on field observations to Mill workshops, harvesting work, spray work, dish scratching work and land application work, all workers have been equipped with PPE which is in accordance with their respective potential hazards. The PPE used by employees includes: safety shoes, boots, cloth gloves, rubber gloves, leather gloves, masks, glasses, earplugs etc. Specifically, for spraying activities using chemicals, the company has provided a rinse house / sanitation house which functions as a place for workers to clean themselves after doing spraying work before they return to their respective homes.

6.7.4

The company shows proof of payment as follows:

- BPJS Employment of PT BIA for September 2020 paid on October 15, 2020 through BNI bank transfer.
- BPJS Health PT BIA for September 2020 paid on September 9, 2020 through BNI bank transfer.

Besides company employees, there are also plasma and contractor employees who work for the company. Based on interview with spray worker at plasma division 1 known that workers do not have BPJS Health and Employment and must

pay for medical treatment. Results of document review of list of contractors and its worker known that there are employees who do not have BPJS yet.

Therefore, the company has not been able to show evidence that all workers has been given health and accident insurance. Based on that, this indicator becomes a **nonconformity No. 2020.04 with non critical category**

6.7.5

The company has shown evidence of recorded work accidents using the Lost Time Accident (LTA) measure. Based on the results of a document review of work accident records, it can be concluded that from January 2020 to September 2020 there were 14 work accidents with a loss of 6,040 days of work. This is because there were deaths due to work accidents, the company has investigated these deaths. However, in terms of evaluation, the number of accidents has decreased compared to 2019, which was 25 accidents. The results of the evaluation state that the frequency of accidents occurring has decreased from the previous year but the severity of the accidents has increased. The results of this evaluation become material for improvement in program making, implementation and monitoring of OHS in the company.

6.7.2 Status: Non-conformity No. 2020.03 with Non-critical criteria

6.7.4 Status: Non-conformity No. 2020.04 with Non-critical criteria

PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT

7.1

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

7.1.1

The company has a plan for handling IPM documented in the Annual Work Plan. The plan is detailed in the Monthly Work Plan which will be realized in the Manager Monthly Report. Identification of potential pests listed in the SOP for Plant Pest Control (SOP / KBN / 12). The types of pests identified can cause potential including nettle caterpillars, rats, beetles, grasshoppers and pigs. While the types of diseases identified include ganoderma, stem rot, marasmius infection and shoot rot. The control method used is a combination of biological, mechanical, chemical and physical control.

The company shows documents related to monitoring Pests and Diseases in 2020. The data are the results of the census of nettle caterpillar for the March 2020 period for Division 3 Estate A with a total census of 14,209 points, 19 principals attacked with an attack percentage of 0.13% or still below threshold so that the company does not take control measures.

7.1.2

Based on the results of interviews with management and field visits to Estate A, it is known that the company does not use invasive species as regulated in the Minister of Environment Regulation No.P.94/MENLHK/SEKJEN/KUM.1/12/2016.

7.1.3

Based on the results of interviews with management and field visits to Estate A, it is known that the company does not use fire in controlling pests.

Status: Comply

7.2

Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.

7.2.1

The company has documented the Toxicity Monitoring of Pesticides and Chemical Materials in Estate A and Plasma Division I. The document details the type of material used, registration number, control target, acute oral toxicity (oral LD50), dose / ha, LD50, active ingredient (%) and active ingredient / ha.

Integrated pest control is carried out based on predetermined methods, such as biological, mechanical and chemical, where chemical control is the last method based on the results of detection and census that exceeds economic threshold values. Biological control is done as a preventive measure to suppress or control pest populations naturally (using natural enemies).

7.2.2

The company conducts routine pesticide applications to control weeds in circles and path. The company shows documents

regarding the use of pesticides in operational activities. The company shows a record of the use of pesticides which explains the active ingredients used, the dosage of LD-50 and the amount of active ingredients applied per hectare. For example, Estate A, the activities of circle and path spraying used by Round Up 486 SL, dosage 2 liter/ha, Toxicity (LD50) 5600 mg/kg.

7.2.3

The company has a reducing the use of pesticides programme, monitoring is carried out every day, monthly and yearly. Furthermore, the detection and census of pests and diseases are carried out regularly as an early warning system, aimed at preventing the spread of pests and diseases, so that it is expected to minimize the use of pesticides. Pesticides are only used if investment in pests and diseases has exceeded the economic threshold.

The integrated pest management program is implemented by the company and is monitored and evaluated every month. Evaluation is carried out in the form of a pest infestation matrix and disease symptoms that describe the type of pest; attack rate; attack analysis, level to threshold; conclusion to determine control techniques if needed.

The company has shown evidence of chemical reduction for Integrated Pest Control activities. One way is by spraying which is carried out selectively in shaded areas and few weeds, besides that, a pest control mechanism is carried out based on the results of the census. This is also supported by data on the use of Estate A pesticides in 2020 (period January-August 2020) where there is a decrease in use compared to the January-August 2019 period.

Based on the pesticide use data shown, the use of pesticides for pests has been minimized because the application will only be carried out if the census results are above the control threshold.

7.2.4

There is no prophylactic method in the use of pesticides by companies. The company only controls using pesticides if the pest attack census shows results above the threshold. Whereas for weed control If the conditions of the circle and harvest pathway are still quite standard, weed control will be delayed. Based on observations of spraying activities, the application method is not a preventive application, but is more selective for locations that have weeds.

7.2.5

The company has a complete list of Pesticides which are included in WHO Class 1A and 1B. Based on the Decree of the Board of Directors No: BIA / DIR / 25/171221, December 22, 2017 concerning Integrated Weed Control, in point 4 it says "emphasizing the use of limited herbicides such as paraquat must be stopped".

Based on the verification of documents carried out, PT BIA has stopped using pesticides with active ingredients paraquat and from the study of the stock of pesticides, there are no active ingredients with paraquat. Based on field observations and interview with spraying worker at block 3.26, block 8.32 and chemical warehouse, it is known that the company did not use pesticides with active ingredient of paraquat.

7.2.6

The company can show that the application of pesticides is carried out by trained people and complies with the applicable guidelines in product labeling and storage. Beside that, the company shows a list of employee training on March 7, 2020 at Estate A Division 4 on the purpose of the activity to find out how to spray properly and safely during application in the field using the proper PPE.

Based on field observations and interviews with pesticide operator. The workers are equipped with shoes such as PPE, helmets equipped with face shield glass, aprons, shirts and trousers, masks and gloves. This type of PPE is in accordance with the recommendations of material safety data sheets for glyphosate and methyl metsulfuron. Workers can also explain and show work according to procedures, such as justifying the use of pesticides, considering the flow of the wind during spraying, mixing of pesticides, pesticides and their targets, prohibited areas for spraying such as riparian zones.

7.2.7

The company has procedures for storing pesticides in the Hazardous Material Management and Control Procedure (No: SOP / HSE / 18, December 24, 2017).

Based on field observations to the company's pesticide storage warehouse, it is known that the storage of pesticides has been carried out according to existing procedures such as material safety data sheet, separate locations from other items and the floor is concrete so it is minimize pollute the environment if there is a spill. Beside that, there is a symbol of toxic hazardous.

7.2.8

The company's hazardous waste management procedure is contained in several documents, including the following:

- Document No. SOP / HSE / 20 dated 24 December 2017 concerning the handling and management of hazardous waste. Procedures include, among other things, identification of waste, sorting and temporary storage of waste, disposal and disposal of waste, and evaluation and reporting.
- No. IK-HSE-30 regarding OHS Guidelines for Handling Hazardous Waste.
- No. IK-HSE-31 concerning Handling of Genset Hazardous Waste.
- No. IK-HSE-33 concerning Genset Hazardous Waste Collection.
- No. IK-HSE-37 regarding OHS Guidelines for Handling Clinical Waste.
- No. IK-HSE-38 concerning Washing and Cleaning of Used (Ex) Pesticides Packaging.

Based on the field visit to TPS LB3 and interviews with the officer in charge of Hazardous Waste Warehouse and the management fully understands the management of Hazardous Waste, which includes waste pesticide packaging and its application is in accordance with the SOP.

7.2.9

The results of the document review, interviews with management and employees, and field observations revealed that the company did not apply pesticides by air.

7.2.10

The company maintains a whole list of spraying employees (pesticide operators) for Estate A and Plasma 1 with the following details:

- Estate A
 Division I with 16 male workers and 12 female workers
 Division II with 9 male workers and 6 female workers
 Division III with 18 male workers and 6 female workers
 Division IV with 17 male workers and 8 female workers
 Division V with 27 male workers and 6 female workers
 The total is 125 sprayers
- The total number of Plasma 1 sprayers is 4 male workers

General and special health examinations (Cholinesterase, Audiometry and Spirometry) on 11-20 December 2019 for 129 estate A and plasma 1 workers (workers examined consisted of spray and fertilizer workers) From the results of the assessment it was found that there were no workers who had decreased health quality and declared vit for work.

7.2.11

The company has a Decree of the Board of Directors (No: BIA / DIR / 21/171221, dated 22 December 2017) regarding policies for pregnant or lactating women workers. It was explained that pregnant or breastfeeding female workers were prohibited from spraying. Based on field visits and interviews with spray workers, it was found that none of the spray workers were pregnant or breastfeeding.

Pregnancy checks are only carried out on spray and fertilizer workers every month to find out whether the spray worker is pregnant or not. Pregnancy examinations are only carried out for female workers who do not use contraceptives, as for those who use contraceptives only when they feel signs of pregnancy are present. This is in accordance with applicable laws and regulations.

For workers who are pregnant, the company still employs them and is placed in a light work area and does not have a high risk of hazards such as contact with chemicals, lifting heavy items, and so on.

	Status: Comply	
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7.3**Waste is reduced, recycled, reused and disposed of in ways that are environmentally and socially responsible manner.****7.3.1**

Based on a review of the waste identification documents, the company has identified wastes generated from employee housing activities and company operations, including hazardous waste. Based on field visits to employee housing, the company has managed all of its waste well by providing trash cans in front of all employees' houses with organic waste separated from inorganic waste. All waste generated is routinely disposed of at the final waste disposal site (TPSA) for subsequent dumping after the TPSA is full. The TPSA is located far from housing and from water sources.

To manage hazardous waste, the company has identified the type and amount of hazardous waste in the company and has collaborated with parties to the final hazardous waste processor. Based on the explanation above, it is known that the company has cooperated with a licensed third party related to hazardous waste management, in accordance with the applicable regulations.

However, based on field visits and studies of several documents related to waste management, the following are known:

1. Based on field visits it is known that:

- Apart from the empty loading bin POM 1, the company discharges solid waste from clarification stations directly on the ground and in places that have been prohibited from potentially leaching which pollutes the environment.
- In the WWTP area there is a runoff of waste from waste pond number 2 (cooling pond) to waste pool number 3 (anaerobic pond).

2. Based on the results of the document review, it is known that:

- The results of the identification of LB3 that have been carried out by the company have not identified all B3 waste produced, such as plastic inner fertilizers, used grease packaging and used PPE spray (ex-mask cartridges, rubber gloves, aprons and boots)
- The verification results of the official report on the delivery of Hazardous Waste Warehouse and the hazardous waste producing manifest, the company sent medical waste on January 11, 2020, but until the audit was carried out (October 13, 2020) the company had not sent back the medical waste generated (more than 8 months).

This becomes Non-Conformity No.2020.05 with non critical category.

7.3.2

The company shows the hazardous waste log book and balance for all hazardous waste warehouse units in POM 1, Estate A and plasma 1. Based on the existing log book and waste balance, the types of hazardous waste stored until October 2020 include:

1. Used oil as much as 4,700 L
2. Used oil filter as many as 873 pcs
3. 103 pcs of used batteries
4. Used cloth as much as 246 Kg
5. 684 pcs of used pesticide packaging
6. Used cartridge as much as 86 pcs
7. 32 pcs of used TL lamps
8. Medical waste as much as 2 drums

A hazardous waste manifest is available for PT Primanru Jaya. For example, for Estate A on February 15, 2020 for hazardous waste which consists of 5.8 tons of used oil (29 drums); 2.7 tons of used batteries (90 pcs); 1.1 tons of used filters (11 drums) and 15 kg of used pesticide packaging (40 pcs). In addition, the Manifest for Estate A on 11 January 2020 was also shown for hazardous waste consisting of 200 kg of expired medicine (1 box); 5.78 kg of used pesticide packaging (180 pcs); 200 pcs of used filters and 7.2 tons of used oil.

- Bill of Lading by PT BIA to PT Salam Pacific Indonesia Lines for 7.50 tons of hazardous waste in a container dated January 22, 2020.

- Approval of Loading of Goods from the Merauke Class IV Port Authority and Port Authority, Director General of Sea Transportation No. PK.406 / 3/7 / KSOP-MRK-2020 dated 18 February 2020 concerning Permit to Load Dangerous Goods to tons of B3 Waste in a Container by PT Salam Pacific Indonesia Lines.
- A bill of lading by PT Salam Pacific Indonesia Lines to PT Primanru Jaya for 20 tons of hazardous waste in a container dated February 8, 2020.

7.3.3

As explained in criteria 7.3.2 and 7.3.3, the company does not burn waste and the hazardous waste it produces either closed or openly, but the company manages waste by dumping it in a landfill and the hazardous waste produced is managed by 3rd party utilizing and destroying hazardous waste.

Meanwhile, the waste produced from the by-products of processing FFB into CPO and Kernel in the POM is solid waste and waste that the company uses as boiler fuel for shells and fiber, for oil palm empty bunches and POME the company applies it to the field as a complement fertilizer.

7.3.1	Status: Non-conformity No. 2020.05 with Non-critical criteria
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7.4 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

7.4.1; 7.4.4

The company has an SOP to manage soil fertility in order to optimize yields, namely:

- Immature Plant Care SOP (SOP / KBN / 05)
- SOP for Producing Plant Care (SOP / KBN / 06)
- Plant Fertilization SOP (SOP / KBN / 07)

The implementation and monitoring of SOP can be seen from the monitoring of fertilization work by each division while monitoring the results of the fertilizing performance is carried out by the agronomics section on quality control.

7.4.2

Soil and leaf sampling is done annually as a basis for fertilizer recommendations. The Soil and Leaf Sample Test was last carried out in 2019 as a recommendation for the preparation of the 2020 fertilizer program conducted by the Central Plantation Services Laboratory of PT Central Alam Resources Lestari.

The results of recording soil and leaf samples shown by the company include the following:

- Leaf analysis results (November 28, 2019 completed in analysis) in Estate A inform the content of the elements N, P, K, Mg, Ca, and B.
- Soil analysis (December 4, 2019 have been analyzed) inform concerning soil type, pH, organic C content, total N-elements, P, Ca-dd, Mg-dd, K-dd, and CEC.

7.4.3

The company has a recording strategy for nutrient recycling which includes the use of EFB applications, palm oil mill effluent application, shell, fiber and boiler ash. Based on the results of the document review, it is known that the application of EFB in 2020 for Estate A is 17,753 Ton..

The results of the field visit to Estate A and Plasma Division 1, the EFB applied between plants. In addition EFB is also used as mulch for the planting of beneficial plants. Application dosage is between 250 - 300 Kg/plant.

7.4.4

The company has shown documents on records of fertilization in Estate A, while the realization compared to the fertilizer budget for the first semester of 2020 is 96% covering NPK fertilizers. It is know that records of fertilizer input were maintained.

	Status: Comply
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7.5

Practices minimise and control erosion and degradation of soils.

7.5.1; 7.5.2

The company has maps that identify marginal and fragile areas, topographic maps that explain land slopes and maps of peat areas. The map is used to identify areas that are not suitable for planting. Based on general field observations, it is known that the area in PT BIA is predominantly flat. There is no steep area planted with oil palm.

At the time the assessment was carried out, the company did not have plans to carry out replanting activities. The oldest age of a palm oil plant in the company's operational area is 8 years (PY 2012). At the time of the audit activity, there were no new planting activities in the area of the company's management. Based on the topographic map shown also concluded that there is no steep slope land in the company area. The dominant corporate management area is flat and bumpy.

7.5.3

There is new planting of palm oil on steep terrain.

Status: Comply

7.6

Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.

7.6.1

The company has a soil survey that identified the type of soil. The company maintains a map that identifies marginal and fragile areas, a topographic map describing the slope of the land and a map of the area PT BIA. Beside that, this maps information is used by the company in the development of oil palm plantations which are now underway such as the establishment of road, bridge, trench and other infrastructure. There is no peat soil type in the area managed by PT BIA.

7.6.2

Based on Soil Survey and Land Suitability Evaluation PT BIA, it is known that PT BIA concession is situated less than 100 meters. The dominant elevation is 40-60 meter above sea level covering nearly the entire area. Areas with 60-68 meter above sea level elevation is found in the north and west parts of Estate A. Slope in PT BIA is around 3-15% with dominant slope class of 8-15%. There is no marginal and fragile soil.

Based on field observations at Estate A and Plasma Division 1, it is known that the area in PT BIA is predominantly flat. There is no steep area.

7.6.3

The company has a soil survey that identified the type of soil. The company maintains a map that identifies marginal and fragile areas, a topographic map describing the slope of the land and a map of the area PT BIA. It is become guidance for company to planning the drainage, irrigation system, road and other infrastructure.

Status: Comply

7.7

No new planting on peat, regardless of depth after November 15th, 2018 and all peatlands are managed responsibly.

7.7.1; 7.7.2; 7.7.3; 7.7.4; 7.7.5; 7.7.6; 7.7.7

The company has a Soil Map by Aksenta on October 2018. Based on that document, it is know that soil type namely Oxic Dystrudepts, Typic Hapludults, Typic Plintudults, Aquic Hapludults, Psammentik Dystrudepts and Typic Dystrudepts. There is no peat soil type in the area managed by PT BIA.

Based on field observations at Estate A and Plasma Division 1, it is known that the area in PT BIA is dominantly flat. There is no peat area.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

For water and water resources management, the company has several related procedures including:

- Document No. SOP / HSE / 14 (Rev. 01) dated 01 December 2019 concerning Management and Monitoring of Boundary Areas. Procedures include border management, implementation of riverbank conservation, maintenance of springs, monitoring of border areas, socialization and training, as well as reporting and evaluation.
- Document No. SOP / HSE / 016 dated 24 December 2017 concerning monitoring and measurement of environmental quality. The procedures include, among other things, a plan for measuring water quality, the physical and chemical components of surface water that are monitored including: TSS, BOD, COD and pH, maintenance of conservation areas consisting of springs and river basins.

The company has a surface water quality monitoring program (river water and clean water used by employees) which is carried out regularly every 6 months. The test was carried out in collaboration with the Laboratory of PT Greenlab Indo Global (Reg. KAN No. LP-1342-IDN). The last monitoring of surface water quality was carried out for the first semester of 2020, namely on 2 June 2020. From this data, it is known that none of the results of testing the quality of river water and clean water exceed the quality standards required by the relevant regulations.

7.8.2.

The company has a surface water quality monitoring program (river water and clean water used by employees) which is carried out regularly every 6 months. The test was carried out in collaboration with the Laboratory of PT Greenlab Indo Global (Reg. KAN No. LP-1342-IDN). The last monitoring of surface water quality was carried out for the first semester of 2020, namely on 2 June 2020.

The company shows several documents related to the management and maintenance of water sources, including the following:

- Promote spraying limits to sprayers every morning apple.
- Plant monitoring which is carried out simultaneously with monitoring of endangered and protected species around riparian / river boundaries is carried out every month.
- Maintain all plants that grow on the riverbank.
- Conducting regular testing of river water quality upstream and downstream, liquid waste, and monitoring wells, which are contained in the Liquid Waste Quarterly Report and RKL / RPL Semester Reports.
- Carry out regular measurement and test of river sedimentation every semester.

7.8.3

The company already has several procedures regarding liquid waste management, including the SOPs as follows:

- Document No. SOP / KBN / 21 dated December 1, 2019 regarding Land Application, which is further detailed in the Work Instruction document No. IK / KBN / 54 dated 01 December 2019 concerning Land Application. Procedure refers to KepmenLH No. 29 of 2003 and KepmenLH No. 28 of 2003.
- Document No. SOP / PKS / 07 dated 24 December 2017 concerning POME (Palm Oil Mill Effluent) and Palm Oil Solid Waste, with the following details: regarding POME, procedures include technicalities for controlling POME, including regulating the flow of the pond so that it does not overflow into environmental agencies, taking samples every week for monitoring pH and temperature parameters, monthly testing in the laboratory, evaluating test results, application of liquid waste and coordination with the estate.

The company does not discharge waste water from the results of oil palm processing activities into water bodies or into sea water, but instead uses it as a fertilizer complement in garden land (land application).

Land Application permit for waste from Mill

- Decree of the Head of the Merauke Regency Environment Agency (DLH) No. 810/01 dated 12 January 2018 concerning the Approval of the Implementation of the Assessment of Wastewater Utilization by PT BIA on Oil Palm Plantations.
- Recommendation Letter of DLH Merauke Regency No. 660.3 / 206 dated 27 May 2019 concerning Recommendations for Approval of POME Land Application for an area of 55.68 ha in Blocks 7-19, 7-20, 7-23 and 7-24.

- Decree of the Head of the Merauke Regency Investment and One Stop Integrated Services (DPMPTSP) No. 502/004 / IPAL / 2019 dated 27 May 2019 concerning Approval of Fulfillment of the Wastewater Disposal Permit Commitment.

The company shows a record of the results of the water quality test results for Pond 1 (inlet) and Pond 7 which refers to the KepmenLH No. 28 and 29 of 2003. Testing is carried out every month by the Inspection and Testing Department of Sucofindo (Reg. KAN No. LP-024-IDN).

Based on the results of the monthly POME test (January-August 2020), it is known that the quality of POME produced by POM 1 does not exceed the quality standards required in KepmenLH No. 28 and 29 of 2003. In addition, the company has also tested monitoring wells (LA monitoring wells, non LA monitoring wells and comparative monitoring wells) every month along with liquid waste testing, while LA soil testing is carried out every 11 June 2020.

7.8.4

The company can show water use documents for the CPO POM 1 palm oil processing unit for the period October 2019 - September 2020. Water usage data is recorded based on the flowmeter at WTP Mill. Based on the water usage data, it is known that the company has made efforts to make efficient use of water in accordance with the set budget.

The company already has a surface water use permit for POM 1 based on the Decree of the Minister of Public Works and Public Housing number 619 / KPTS / M / 2019 dated 15 July 2019. This decree is valid for 5 years. Based on data on water use for treatment units in the past year, it is known that the average monthly water use is 32,112 m³ / month, this is still below the maximum allowable flow under the permit (51,840 m³ / month).

Status: Comply

7.9

Efficiency of fossil fuel use and the use of renewable energy is optimized.

7.9.1

The management unit has a plan to increase the efficiency of fossil fuel use which is stated in the document on the efficiency of the use of fossil fuels and the increase in the use of renewable fuels in 2020. Some of the plans are set out, among others: periodic checking of Mill machines, drive precisely and efficiently.

The company has made efficiency in the use of fossil fuels by utilizing solid waste generated from Mill operational activities as boiler fuel. The solid waste is Shell and Fiber.

From the data on fuel consumption, it can be seen that to produce 53.401,78 tons of CPO, the company needs 21.611,00 tons of fiber and 8.491,00 tons of shells, which can save 202.169,00 liters of fossil fuels. Beside that company also record the usage of renewable energy, such as in August 2020 POM 1 process 8289.24 MT FFB using 106,181 kWh from generator (52% from total energy) and 96,600 MT from turbine (48% from total energy), it means 48% energy usage in POM 2 comes from renewable energy.

Status: Comply

7.10

Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

7.10.1

All wastes including sources of emissions and pollution from Mill and plantations are identified and recorded in the waste identification and emissions 2020. Potential GHG emissions from plantation and Mill activities that have been identified include transportation activities, fertilization activities, generator emissions and boiler emissions.

Mill and its suppliers have calculated GHG emissions for the 2019 period using the RSPO Palm GHG calculator version 4.01 (apply the full version). The results of this calculation are presented in the following details:

Emission per product	tCO ₂ e/t Product
CPO	2.15

PK	2.15
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Land use	Ha
Planted area	8,290.24
Conservation (forested)	30.17
Conservation (non forested)	279.49

Summary of field emission and Sinks

Description	Own crop			Group		
	tCO ₂ e	tCO ₂ e/ ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ ha	tCO ₂ e/t FFB
Land conversion	164,195.39	19.81	0.65	0.00	0.00	0.00
CO ₂ emissions from fertilizer	25,268.41	3.05	0.10	0.00	0.00	0.00
NO ₂ emissions	20,000.45	2.41	0.08	0.00	0.00	0.00
Fuel consumption	4780.51	0.58	0.02	0.00	0.00	0.00
Peat oxidation	0.00	0.00	0.00	0.00	0.00	0.00
Sinks						
Crop sequestration	-77,611.02	-9.36	-0.31	0.00	0.00	0.00
Sequestration in Conservation area	36,66616.91	-4.42	-0.14	0.00	0.00	0.00
Total	100,016.83	12.06	0.31	0.00	0.00	0.00

Palm Oil Mill Effluent (POME) Treatment

Remarks	tCO ₂ e	tCO ₂ e/t FFB
Emissions sources		
POME	50,840.46	0.20
Fuel consumption	1419.36	0.01
Grid electricity	0	0
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	52,259.82	0.20

7.10.2

The land clearing after 2014 is not consider the carbon stock assessment because BIA not yet become member. To minimize GHG, PT BIA is conserve HCV area as wide as 327.66 Ha. PT BIA do not conduct any new development since 2018. so current company net GHG Emission has been described on indicator 7.10.1.

7.10.3

The company has an EIA document which includes identification of sources of pollution arising from company activities both in factories and in estate that have an impact on the environment and the safety and health of humans / workers in and around the company's area.

In an effort to minimize the impact of these impacts, the company carries out periodic management and monitoring in accordance with the planning in the previous AMDAL document. Management and monitoring plans are made annually including water, air and soil quality testing and noise testing. The results of the testing are reported in the RKL RPL report every 6 months to the District and provincial Environmental Services and the Ministry of the Environment. In addition, the company's efforts to minimize this impact, especially in the Palm Oil Mill of PT. BIA, always maintaining the production machinery.

The company has conducted air quality tests in semester 2 of 2019. The air quality tested is ambient air, noise, odor and emissions from generators, boilers and chimneys at the company's location both in the garden and factory. Emission air sampling was carried out by a sampling expert from PT Greenlab Indo Global (Reg. KAN No. LP-1342-IDN) which is one of the environmental laboratories that has been accredited by the National Accreditation Committee (KAN) and is registered at the Ministry of Environment and Forestry of the Republic of Indonesia. Chimney emission air sampling methods refer to the Indonesian National Standard (SNI), the Environmental Protection Agency (USEPA) and the Japanese International Standard (JIS).

Status: Comply

7.11

Fire is not used for preparing land and is prevented in the managed area.

7.11.1

The company has made a Decree of the Board of Directors Number: BIA / DIR / 03/171221 concerning Zero Burning on December 22, 2017 where the company does not open plantations or cultivate land by burning and Directors Decree Number: BIA / DIR / 04/171221 regarding the prohibition of opening land by burning. This is evidenced by the SOP for Land Opening and Preparation (SOP / KBN / 01) which came into effect on 24 December 2017, which is a requirement that companies do not clear land by burning land.

Based on documents in the form of photos of land clearing activities between 2012 and 2017, no one used fire. Based on field visits to each garden audit location, there are no signs of land clearing using fire.

7.11.2

The company already has a fire suppression system which is stated in several procedures, namely:

- SOP for Forest and Land Fire Control (SOP / HSE / 22, 24 December 2017, Revision 00) which explains, among others, fire risk analysis and fire hazard level index, fire detection, forest and land fire prevention, forest and land fire prevention, efforts post-disaster management, as well as reporting and evaluation
- SOP for Emergency Preparation and Handling (SOP / HSE / 04, 24 December 2017, Revision 00), which aims as a guide in planning to deal with emergencies in all PT BIA work areas.
- SOP for First Aid in Accidents (SOP / HSE / 04, 24 December 2017, Revision 00), which describes the starting from identification, provision to the mechanism for implementing first aid in the company.

In addition, the company has also formed an organizational structure for an Emergency and Fire Response Team for Estate A including plasma 1 and Mill with an organizational structure that includes the Chairman, Deputy Chairperson, Secretary, Fire Coordinator, Evacuation Team Coordinator, First Aid Team Coordinator, logistics team, transportation team, the internal communication team, the external communication team, the security team and the ward team, each team has a chairperson with 6-10 members each.

7.11.3

In carrying out fire prevention and control activities, the Company has identified fire-prone areas in and around the company's operational areas which are listed in the Hazard Map for Garden Lands with a scale of 1: 50,000 for estate A. The map contains information regarding areas or locations that the company has identified as prone to fire.

The company has also implemented posters and signboards for prohibiting burning, being aware of the dangers of fire, the danger of fire, burning forests, burning piles and others as an effort to prevent forest and land fires.

Apart from installing posters and signboards, the company also socializes face-to-face with the community around the company, where the company asks the public to report if a fire occurs inside or outside the company area, helps extinguish fires with existing equipment before the company's fire fighting emergency response team arrives for extinguishing fire and it is forbidden to open a field using fire. The last proof of socialization was on 18, 19, 21 and 22 September 2020 to Kindikki, Selil, Manda and Mandekman Villages.

Status: Comply

7.12

Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are

identified and protected or enhanced.**7.12.1**

Land clearing in the PT BIA concession area began in 2012 after obtaining the HGU. In 2015 the company conducted an HCV assessment through a licensed independent team. Company has disclosed the land clearing without prior HCV assessment in 16 January 2018 and updated in Feb 2020. The result of LUCA review sighted there are liability in PT BIA and must follow RaCP process.

7.12.2

The first HCV assessment conduct in 2015 and review by HCVRN with status unsatisfactory. In 2020, the company conducted a HCV with independent assessor of Ecologica Consultant on January 22 to May 15 2020. In July 2020 the company's HCV assessment was approved by the HCV-ALS assessment team and was deemed satisfactory / accepted. While for HCS is not applicable because the company has not cleared new land since 2018 (15 November 2018) within its concession area.

The document on the results of the HCV assessment concluded that in the company's concession area, HCV1, HCV2, HCV3, HCV4, HCV5 and HCV 6 were found with a total area of 327.66 hectares spread across Estate A covering 297.49 hectares and in plasma 1 covering an area of 30.17 Ha.

In the identification results, 11 species of vegetation / flora are included in the endemic or RTE species category (Rare, Threatened or endangered), 3 species in the vulnerable category (Vulnerable-VU) which are listed in the red list of the IUCN, 2 species are included in the CITES appendix II and 3 species are included in the protected category of Indonesian Law, four (4) mammal species are included in the RTE category, there are no amphibia species that are included in the RTE category, but there are 9 species of reptiles that are included in the RTE species, Twenty-seven (27) Avifauna species fall into the RTE category.

7.12.3

HFCL is not applied in Indonesia, until further decisions by RSPO.

7.12.4

The document on the results of the HCV assessment concluded that in the company's concession area, HCV1, HCV2, HCV3, HCV4, HCV5 and HCV 6 were found with a total area of 327.66 hectares spread across Estate A covering 297.49 hectares and in plasma 1 covering an area of 30.17 Ha.

In the identification results, 11 species of vegetation / flora are included in the endemic or RTE species category (Rare, Threatened or endangered), 3 species in the vulnerable category (Vulnerable-VU) which are listed in the red list of the IUCN, 2 species are included in the CITES appendix II and 3 species are included in the protected category of Indonesian Law, four (4) mammal species are included in the RTE category, there are no amphibia species that are included in the RTE category, but there are 9 species of reptiles that are included in the RTE species, Twenty-seven (27) Avifauna species fall into the RTE category.

In the HCV assessment process the company has involved the surrounding community and other stakeholders including:

1. On February 3, 2020 a meeting (FGD) with the Kindiki community,
2. On February 6, 2020 a meeting (FGD) with the Manda community
3. On February 7, 2020 a meeting (FGD) with the Mansdekman community
4. On February 4, 2020 a meeting (FGD) with the Selil community
5. With the Government Office and other stakeholders on April 30, 2020 through a zoom meeting with participants who attended, including: Wasur National Park, Korindo Group, BKSDA Merauke, Merauke Forest Service, WWF, Head of Environment, representatives of indigenous peoples , Public Works Service, PMPTSP Service, and Musamus University.

The management and monitoring plan has been stipulated in the assessment result document. Implementation and management and recent monitoring that has been carried out, among others:

1. Take care of all the plants that grow on the riverbank.

2. Socialization of spraying limits to sprayers every morning apple
3. Carry out tests of the quality of river water upstream and downstream, liquid waste, and monitoring wells periodically, which are contained in the Liquid Waste Quarterly Report and RKL / RPL Semester Reports.
4. Carry out measurement and testing of river sedimentation periodically every semester.
5. Monitoring of plants which is carried out simultaneously with monitoring of endangered and protected species around riparian / river boundaries is carried out every month.

7.12.5

The establishment of a management and monitoring plan in the HCV assessment result document is inseparable from the advice and or input of the surrounding community, this is in addition to reaching consensus regarding the management and monitoring of HCV as well as to maintain the rights of local communities in the HCV area and involve them in management and maintenance of the HCV area.

The involvement of the surrounding community and stakeholders in the process of determining the management and monitoring program has been carried out, including:

1. On 3 February 2020 a meeting (FGD) with the Kindiki community
2. On 6 February 2020 a meeting (FGD) with the Manda community
3. On 7 February 2020 a meeting (FGD) with the Mansdekman community
4. On 4 February 2020 a meeting (FGD) with the Selil community
5. With the Government Office and other stakeholders on 30 April 2020 through a zoom meeting with participants who attended, including: Wasur National Park, Korindo Group, BKSDA Merauke, Merauke Forest Service, WWF, Head of Environment, representatives of indigenous peoples, Public Works Service, PMPTSP Service, and Musamus University.

7.12.6

The management and monitoring plan has been stipulated in the assessment result document including:

1. Make buffer zone with special care in certain areas bordering the Bian River
2. Maintain natural vegetation
3. Protect nest trees / nesting areas for RTEs
4. Evaluation of species development
5. Species population survey
6. Land cover analysis based on satellite imagery
7. Monitoring of sedimentation at the river outlet to the swamp by looking at brightness and comparing it with rainfall data
8. Periodic monitoring of river basin integrity
9. Monitor the water discharge level
10. Inventory of sago grove locations
11. Evaluate water quality every semester
12. Collecting data on identify animals regularly at least once a year.

Implementation and management and recent monitoring that has been carried out, among others:

1. Take care of all the plants that grow on the riverbank.
2. Socialization of spraying limits to sprayers every morning apple
3. Carry out tests of the quality of river water upstream and downstream, liquid waste, and monitoring wells periodically, which are contained in the Liquid Waste Quarterly Report and RKL / RPL Semester Reports.
4. Carry out measurement and testing of river sedimentation periodically every semester.
5. Monitoring of vegetation which is carried out simultaneously with monitoring of endangered and protected species around riparian / river boundaries is carried out every month.

Monitoring that has been carried out by the company on protected endangered plants and animals is on September 1, 2020, monitoring is carried out in addition to all types of animals and plants that are also focused on endemic species such as Cassowary, Papuan Julang, King Kakatua, Ground Kangaroo, Cendrawasih Kuning, Mambruk, Kipasan and typical tree species.

Monitoring using the meeting, sound, trail, dirt, fur and nest methods. Several types of animals encountered during monitoring include: Coconut parrots, hornbills, Cendrawasih, Kipasan, Sanca Bodo, Cassowary, Siul Eagle, Kuskus, Red Cheek Nuri, Aru Nuri, King Shrimp, Sago Nuri, Maleo, King Cockatoo, and Urip.

7.12.7

To monitor the status of identified HCVs within the company's concession area, the company has a short-term and long-term management program plan as outlined in the PT Bio Inti Agrindo HCV Management and Monitoring Plan 2020-2025 and several activities have been carried out.

In the management and monitoring plan, there is a monitoring plan that is carried out every month and some that is done once a year. The purpose of monitoring is to get as much data as possible which is used as material for evaluation, where evaluation is carried out on achievement, effectiveness, efficiency and impact. for the sustainability of the activity program.

7.12.8

Land clearing in the PT BIA concession area began in 2012 after obtaining the HGU. In 2015 the company conducted an HCV assessment through a licensed independent team. The HCV assessment report was submitted to the HCV-ALS assessment team for quality review in 2016, however the results of the review have not been satisfactory / have not been received. Land clearing continued from 2016 to 2017. The improved HCV assessment report was submitted to the HCV-ALS assessor for quality review from 2017 to 2019 with the final results still unsatisfactory / not received. In addition to this, the company has completed land clearing up to 2018 and there are no plans to open new land in 2018 and in future years on the company's concession areas.

Then the Company conducted a review of the HCV with independent assessor Ecologica Consultant on January 22 to May 15 2020. In July 2020 the HCV assessment carried out by the company was approved by the HCV-ALS assessment team and was deemed satisfactory / Accepted. And because the company has not cleared new land since 2018 (15 November 2018) within its concession area, the company is not required to assess the presence of HCS (High Carbon Stock).

On this basis, the Company conducted a Land Use Change Analysis and was approved by the RSPO on August 13, 2020. Furthermore, the Company has shown the Remediation and Compensation Plan (RaCP) document with a draft note that was approved by the RSPO on September 28, 2020, the remediation requirements and the compensation is:

1. The company needs to remediate the required river bank covering an area of 434.21 Ha where the description of the impact that requires remediation activities is for example riparian zones, steep slopes, areas that are prohibited by the state by law and regulations.
2. The company compensates for conservation of the Wildlife Forest Reserve under the authority of BKSDA Merauke Regency, especially the Lake Bian Wildlife Reserve covering an area of 35,352.45 hectares.

However, the entire RaCP document just received a RSPO review on October 6, 2020 and the Company sent corrections to the results of the review on October 18, 2020. Until the audit ended, there was no reply from the RSPO regarding the approval of the revised RaCP results. submit by the Company. **This becomes a nonconformity No. 2020.06**

7.12.8	Status: Non-conformity No. 2020.06 with critical criteria	
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3.1 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or √
IC	This will be verified during on surveillance audit	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or √
IC	This will be verified during on surveillance audit	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
IC	This will be verified during on surveillance audit	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
IC	This will be verified during on surveillance audit	√
	Status: Comply	

3.2 Summary of RSPO Partial Certification.

All Management units of PT Bio Inti Agrindo (POM 1 and POM 2) plan for certification in 2020 and include in this scope of certification.

3.3 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

3.4.1. Identification of Findings, Corrective Actions and Observations at Initial Certification

NCR No.	: 2020.01	Issued by	: Satria Adi Putra
Date Issued	: 21 October 2020	Time Limit	: Surveillance - 1
NC Grade	: Non-Critical	Date of Closing	: 22 December 2020
Standard Ref. & Requirement	: 1.1.2 Information is presented in an appropriate language and accessible to relevant stakeholders		
<p>Evidence observed (filled by auditor): Based on the results of the document review and interviews, it is known that:</p> <ul style="list-style-type: none"> - Regulation of the Minister of Manpower No. 100 of 2004 concerning the provisions for the implementation of a certain time work agreement (PKWT) Article 13 states that the PKWT must be registered by the company to the agency responsible for manpower at the local regency/municipality no later than 7 (seven) days after signing. - The results of an interview with the Papua Province Manpower Agency revealed that the company had not submitted the latest report on the use of PKWT workers. - The results of the review of the company's employee list document for September 2020 revealed that there were 294 PKWT employees at Estate A and 37 PKWT employees at POM 1. 			
<p>Non-Conformance Description (filled by auditor): The company has not been able to show evidence that reports on the use of PKWT workers have been presented and accessed by relevant stakeholders.</p>			
<p>Root Cause Analysis (filled by organization audited): PKWT report has not been listed in the Mandatory Document Requirements Form for the Government, so the report has not been reported</p>			
<p>Correction (filled by organization audited): Reporting the use of PKWT workers for the September – October 2020 period to the Merauke Regency Manpower and Transmigration Office</p>			
<p>Corrective Action (filled by organization audited):</p> <ol style="list-style-type: none"> 1. Evidence of reporting PKWT workers to the Merauke Regency Manpower and Transmigration Office 2. HR Work Program 2021 3. Mandatory Document Requirement Form for the Government/Pertanyaan Auditor 			
<p>Assessor Evaluation and Conclusion (filled by auditor): Verification December 14, 2020 The company has shown corrective documents including recordings of reporting PKWT workers to the Head of the Manpower and Transmigration Office on November 3, 2020 (No. BPHNL-Pel/HRD-PKWT/XI/2020-A) and received by the Office on November 26, 2020. However, the auditor still requires verification of the corrective action submitted by the auditee, regarding this matter, the nonconformity No. 2020.01 is declared unfulfilled.</p> <p>Verification December 22, 2020 The company has shown evidence of additional improvements including:</p> <ul style="list-style-type: none"> - The 2021 HR Work Program document which regulates the planning for the mandatory monthly reporting of PKWT workers and the PIC of the person in charge - List of Mandatory Reporting Data Needs to Related Offices along with the form used <p>Based on the data above, it can be concluded that the non conformity No. 2020.01 is declared to have been fulfilled.</p>			

Verified by	:	Satria Adi Putra
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NCR No.	:	2020.02	Issued by	:	Satria Adi Putra
Date Issued	:	21 October 2020	Time Limit	:	Surveillance -1
NC Grade	:	Non Critical	Date of Closing	:	-
Standard Ref. & Requirement	:	6.2.7 Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.			
Evidence observed (filled by auditor): <ol style="list-style-type: none"> Decree of the Central Executive of the Indonesian Palm Oil Association (GAPKI) No. SK / 073 / PPG / II / 2013 concerning the Flow of Work Implementation Process Activities in the Oil Palm Plantation Business Sector stated that the main activity of the plantation business sector is Harvesting and Processing of Fruit into CPO. Based on result of interview with workers at mill, estate, and plasma, it is known that there are workers with contract worker (PKWT) status. Result of document review : <ul style="list-style-type: none"> The company employee list document, it is known that there are 37 contract employees for the operational activities of the POM 1, 245 contract employees for harvester at estate A The document of planning for fulfilling the needs of harvest workers in Estate A and Plasma Division I, but the plan does not describe a measurable program for appointment as permanent employees. SPK No. No BPHNL-SPK/KT-200203-P explain that the worker is a contract worker for harvesting at division 3 estate A start from February 3, 2020 to February 2, 2020. SPK No BPHNL-SPK/KTK-200204-C explain that the worker is a contract worker for <i>kernel bagging</i> POM 1 from February 24, 2020 to February 23 2021 					
Non-Conformance Description (filled by auditor): The company has not been able to ensure that the core work is carried out by employees who have permanent and full-time work positions in accordance with applicable regulations.					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

NCR No.	:	2020.03	Issued by	:	Sansan Suhendar
Date Issued	:	21 October 2020	Time Limit	:	Surveillance-1

NC Grade	: Non Critical	Date of Closing	: -
Standard Ref. & Requirement	6.7.2 There are procedures for emergency response and work accidents in Indonesian which are clearly understood by all workers. There are workers assigned to the field and other work locations and have received First Aid training in Accidents (P3K). First aid kits are available in the workplace.		
Evidence observed (filled by auditor): Based on the results of the study of the document attachment II of the Minister of Manpower Number 15 of 2008 stated that the total contents of the first aid kit were 21 items. In addition, the procedure number SOP/HSE/05 dated 24-12-2017 point 2.3.6 states that the placement of the first aid kit must be in a condition that is easily accessible, clearly marked, in a visible location and easily moved if it is to be used, the type and the number of boxes is adjusted to the number of workers based on the Attachment of the Minister of Manpower No. 15 of 2008. Based on the field visits, it is known that: 1. POM 1 : <ul style="list-style-type: none"> • Flashlight in first aid kit does not turn on (Security post) • Eye cleanser that does not have an expiration date. (Workshop) 2. Estate A does not contain scissors, tweezers and alcohol (harvest and spray work) 3. Plasma Division 1 supervisor or foreman does not bring a first aid kit (spray and harvest work)			
Non-Conformance Description (filled by auditor): The company has not been able to show that the availability of first aid equipment in the workplace has referred to the applicable procedures and regulations.			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by	:		

NCR No.	: 2020.04	Issued by	: Satria Adi Putra
Date Issued	: 21 October 2020	Time Limit	: Surveillance-1
NC Grade	: Non Critical	Date of Closing	: 20 January 2021
Standard Ref. & Requirement	6.7.4 All workers are provided medical care and covered by accident insurance. Cost incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.		

Evidence observed (filled by auditor):

Based on the results of document review and interviews, it is known that:

1. Interview with :
 - Spray worker at Plasma Division 1, it is known that workers do not have BPJS for Health and Employment yet. Also they have to pay for medical treatment.
 - Company management explain that the provision of BPJS services is constrained by administrative completeness such as an invalid ID card, no family card, still a beneficiary.
2. Based on document review:
 - List of employee of Estate A known that all permanent employees and contract employees have registered with BPJS Employment and Health.
 - Sampling of contractor employees at Estate A (CV Papua Lestari Jaya), it is known that they have 15 workers. However, the number of employees who have BPJS Employment are 11 people, and none have been registered with BPJS Health.
 - List of contractor employee at Plasma Division I, it is known that the total number of employees are 64 people. The number of employees who have BPJS Employment are 39 people and for BPJS for employment are 25 people
 - CV Rhava Karya Abadi is known to be undergoing the initial registration process for 9 employees for BPJS Health in October 2020.
3. Article 99 of Law No. 13 of 2003 on Manpower states that every worker / laborer and his family has the right to obtain labor social insurance

Non-Conformance Description (filled by auditor):

The company has not been able to demonstrate that all workers have been provided with health services and are covered by occupational accident insurance.

Root Cause Analysis (filled by organization audited):

From the results of the identification of the completeness of the employee ID (KTP), it was found that several employee NIKs were invalid and could not be registered with BPJS Health and BPJS Employment.

Correction (filled by organization audited):

1. The company conducts employee identity screening (KTP)
2. Coordinate with the Office of Demographic Affairs of Merauke Regency to carry out data collection and recording of employees who do not have an invalid ID card (constrained by covid-19)
3. Register for BPJS Health and Employment for Workers who have a valid ID Card but do not yet have BPJS Health and Employment
4. Paying for BPJS Health and Employment of Workers

Corrective Action (filled by organization audited):

1. Work plan for BPJS Health and BPJS Employment
2. Worker ID card screening report
3. BPJS membership data for contractor workers
4. Coordination report on ID card management with Office of Demographic Affairs of Merauke Regency
5. Proof of BPJS Employment membership registration for new contractor workers
6. Proof of registration of BPJS Health membership for new contractor workers
7. Payment Proof of BPJS Employment for new contractor workers
8. Payment Proof of BPJS Health for new contractor workers

Assessor Evaluation and Conclusion (filled by auditor):

Verification January 20, 2021

The company has shown evidence of improvement including:

1. Planned documents for BPJS Employment and Health PT BIA for October - December 2020 and January - April 2021 which contain plans for collecting invalid ID cards, processing invalid ID cards to the Civil Registry Office of Merauke Regency, managing ID cards for employee IDs that are not completed at the Civil Registry Office, collecting employee heir data, employee registration at BPJS Health and Employment, payment for

- BPJS Health and Employment, confirmation of member activity, card printing and distribution of BPJS Health and Employment cards.
2. The identification report of the verification of the identity of wholesale workers/CV employees in the period 10-20 October 2020. Based on the results of the wholesale labor screening conducted in Divisions 1-9, it is known that there are 25 workers using an identity in the form of a family card, 50 workers using Temporary ID cards, 7 workers whose ID cards have expired and the remaining 512 people already have ID cards.
 3. Recapitulation documents for workers in Estate A, Estate B and Estate C. As for these details, until January 14, 2021, there is still progress in the management of BPJS Employment, namely 40 people in Estate A, 121 people in Estate B and 240 people in Estate C. As for the progress of BPJS Health management, there are 30 people in Estate A, 125 people in Estate B and 235 people in Estate C.
 4. Report document on the results of Coordination of Management of Employee ID Cards and Submission of PT BIA Communication SOPs with the Population and Civil Registry Office on 20 November 2020, with the results of coordination including the Population and Civil Registry Office ready to assist the management of employee ID cards at work locations with data collection after 28 November 2020, referring to the letter of restrictions on company entry and exit and the Regent's circular regarding restrictions on activities due to Covid. (Photo and Assistance Sheet attached)
 5. Proof of BPJS Employment Registration and Payment at Estate A, among others, for CV Rhava Karya Abadi (8 people with advanced acquisition status), CV Mandiri Jaya (2 people with advanced acquisition status), CV Alfaris (21 people), CV Binangun Jaya (26 people), CV Bunga Flores (6 people with advanced status and 17 people with new payment status), CV Citra Abdi (31 people), CV Mandiri Jaya Raya (1 person with advanced status and 1 person with new payment status) and CV Papua Lestari Jaya (13 people).
 6. Proof of BPJS Employment Registration and Payment at Estate B, among others, for CV Putra Abadi Jaya (14 people), CV Sila (17 people with advanced acquisition status), CV Sikka Mandiri (25 people with advanced status and 2 people with status), CV Sasando Papua (31 people with advanced status and 4 new registrations), CV Putra Tea Mandiri (15 people with advanced status), CV Ananda Putra Cahaya (4 people), CV Rajabasa Pratama (3 people with advanced status and 1 person with new payment status), CV Ilham Mandiri (11 people with advanced status and 2 people with new payment status) and others.
 7. Proof of BPJS Employment Registration and Payment at Estate C, among others for CV Rimbil (39 people with advanced status), CV Uma Kalaluk (6 people with advanced acquisition status), CV Berkah Rizki Abadi (16 people with advanced status), CV Sinar Belu (7 people with advanced status), CV Nur Qohar (6 people with advanced status), CV Putra Flores (11 people with advanced status), CV Indah wirabuana (21 people with advanced status), CV Bone Putra (4 people with advanced status) and others.
 8. Sampling of proof of payment for BPJS Health in Estate A includes CV Alfaris, CV Bunga Flores, CV Citra Abadi, CV Papua Lestari Jaya, CV Rhava Karya and so on (proof of payment is attached).
 9. Sampling of proof of payment for BPJS Health in Estate B includes CV Rajabasa Pratama, CV Karya Manunggal A, CV Ananda Putra Cahaya, CV Ilham Mandiri, CV Khely Brothers, CV Sinar Terang Abadi and so on (proof of payment is attached).
 10. Sampling of proof of payment for BPJS Health in Estate C includes CV Karunia, CV Aviro, CV Putra Papua, CV Berkah Rizki Abadi, CV Adi Putra, CV Putra Flores and so on (proof of payment is attached).
 11. Monitoring the recap of BPJS Health and Employment payments per each Estate for the January 2021 period.

Based on the evidence of improvement that has been given, the non-conformance No. 2020.04 is declared to have been fulfilled and will be observed again in the next assessment.

Verified by : **Satria Adi Putra**

NCR No.	: 2020.05	Issued by	: Sansan Suhendar
Date Issued	: 21 October 2020	Time Limit	: Surveillance 1
NC Grade	: Non Critical	Date of Closing	: 20 January 2021

Standard Ref. & Requirement	<p>: 7.3.1</p> <p>There is a waste management plan that is documented and implemented in accordance with applicable laws and regulations, including reduction, recycling, reuse, and disposal, based on the characteristics of toxicity (toxicity) and other hazards.</p>
<p>Evidence observed (filled by auditor):</p> <ol style="list-style-type: none"> Based on PermenLHK number P.56 of 2015 article 7 number 2 point b.1 and PP number 101 of 2014 article 28 number 1 point b.2 B3 waste produced is less than 50 kg (fifty kilograms) per day for B3 Waste Category 1 is stored in a hazardous waste storage area for a maximum of 180 (one hundred and eighty) days and based on company procedure number SOP/HSE/20 dated 24-12-2017 regarding the handling and management of hazardous waste point 2.6 states that the storage of the generated hazardous waste may not be stored for more than 90 days. If the hazardous waste generated is less than 50kg/day, the Licensing Staff will apply for an extension of the waste storage permit for more than 90 days (up to 180 days) to the Ministry of Environment. Based on field visits, it is known that: <ul style="list-style-type: none"> In addition to the POM 1 empty container loading station, the company disposes of solid waste from the clarification station directly on the ground and in a prohibited place that has the potential to be leased which pollutes the environment. In the WWTP area, there is runoff from waste pool number 2 (cooling pond) to waste pool number 3 (anaerobic pond). Based on the results of document review, it is known that: <ul style="list-style-type: none"> The results of the hazardous waste identification that have been carried out by the company have not identified all the hazardous waste produced such as plastic inner fertilizers, used grease packaging and used PPE spray (ex-mask cartridges, rubber gloves, apron and boots) The results of the verification of the hazardous waste delivery minutes and the hazardous waste producer manifest, the company has sent medical waste on January 11, 2020, but until the audit is carried out (13 October 2020) the company has not sent back the medical waste produced (more than 8 months). 	
<p>Non-Conformance Description (filled by auditor):</p> <p>The company has not been able to show that the implementation of waste management is in accordance with the applicable laws and regulations.</p>	
<p>Root Cause Analysis (filled by organization audited):</p> <ol style="list-style-type: none"> The company has identified hazardous waste, but it has not been carried out thoroughly in every work unit due to limited hazardous waste identification experts. The delivery of medical waste has not been carried out until the audit is carried out because the focus of hazardous delivery is still on workshop and estate waste. Hazardous waste delivery activities are carried out every three months, but in April - June there are restrictions on the entry and exit of goods at the Merauke logpond due to the Covid 19 Pandemic. This has resulted in the accumulation of hazardous waste workshops and estate at temporary hazardous store. 	
<p>Correction (filled by organization audited):</p> <ol style="list-style-type: none"> The company re-identifies the hazardous waste produced in all work units The company sends the medical hazardous waste that has been produced 	
<p>Corrective Action (filled by organization audited):</p> <ol style="list-style-type: none"> Provide hazardous waste management training to the personnel in charge of hazardous waste Delivery of hazardous waste according to schedule (3 months) 	
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verify January 18, 2021</p>	

The company has shown several repair documents including:

1. Documents resulting from re-identification of all hazardous waste produced by all work units, but the document has not been completed with who the PIC did, on what date it was implemented and who approved/validated the results of the identification.
2. Report document on the management and transportation of PT Bio Inti Agrindo hazardous waste for the period of December 2020. The document states that transportation is carried out through two modes, namely land and sea modes, land mode is carried out by Internal PT Bio Inti Agrindo (from site to port), while from the port using the services of a third party, namely PT. Greetings Pacific Indonesia Lines (on December 29, 2020) which was handed over directly to PT Primanru Jaya at the port of destination
3. Minutes of delivery of dangerous goods from PT Bio Inti Agrindo to PT Primanru Jaya, delivery using the Transportation Management Service of PT Berkah Mutiara Laut with the SPIL HASYA II ship on December 23, 2020.
4. Hazardous Waste Manifests include: used air filters, used oil filters, used syringes (medical waste), used pesticide packaging, TL lamps, used cartridges, used oil and used batteries with producer PT Bio Inti Agrindo with a delivery date of 24 December 2020.

Verify January 20, 2021

The company has shown several correction documents including:

1. Report on the results of online training on hazardous waste management carried out by the Environmental Pollution Control Professional Certification Agency (LSP Daimaru) which was held on 22-23 December 2020, which was attended by the person in charge of hazardous PT. BIA, namely Ms. Marlen Aviati Sarah Pepiana, with the decision of the competency test result from the training that it was stated that Ms. Marlen Aviati Sarah was competent.
2. Document of the Decree of the Head of LSP Daimaru with the number KEP-SER-2012-005 on 30 December 2020 which is accompanied by a list of competency test results for the person in charge of hazardous waste management on behalf of Marlen Aviati Sarah Pepiana from PT. Bio Inti Agrindo with the position of Asesi/in charge of managing hazardous waste has been declared competent.
3. Documents resulting from re-identification of all hazardous waste produced by all work units carried out by the person in charge of hazardous waste management on January 4, 2021. From the identification results there are 35 types of hazardous waste that must be collected at temporary hazardous store. The identification results are validated by the Sustainability Manager and known by the General Manager.
4. Joint agreement with the Papuan Provincial Government in the context of preventing, controlling and overcoming Corona Virus Disease 2019 that for March 17, 2020 to April 17 2020, the results will still be evaluated.
5. Merauke Regent Circular dated June 15, 2020 Number 440/2520 related to the acceleration towards the new normal order of relaxation of the Papuan context in Merauke Regency. Which states that for ship transportation from and to the destination of Merauke Regency, it is only allowed to transport logistics materials and fuel oil with the approval of the Merauke Regent. Up to a date that can not be determined at this time.

Based on the explanation above, the non-conformance is declared Fulfilled

Verified by : **Sansan Suhendar**

NCR No.	:	2020.06	Issued by	:	Sansan Suhendar
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Date Issued	: 21 October 2020	Time Limit	: 20 October 2021
NC Grade	: Critical	Date of Closing	: 11 August 2021
Standard Ref. & Requirement	7.12.8 If there is land clearing that was not preceded by an HCV assessment before November 2005, or that has not been preceded by an HCV-HCSA assessment since November 15, 2018, the Remediation and Compensation Procedure (RaCP) applies.		
Evidence observed (filled by auditor): PT. BIA conducted an HCV assessment in 2017 but the results of the study were not approved by the RSPO, then PT. BIA conducted a review of HCV in 2020 and was approved by the RSPO in July 2020. Based on this, the Company carried out a Land Use Change Analysis and was approved by the RSPO on 13 August 2020. The Company has then presented the Remediation and Compensation Plan document (RaCP) which has just received an RSPO review on October 6, 2020 and the Company has sent a revision of the results of the review on October 18, 2020. Until the end of the audit there has been no response from the RSPO regarding the approval of the results of the revised RaCP sent by the Company.			
Non-Conformance Description (filled by auditor): The company does not have enough evidence to ensure that the RaCP that has been made has been approved by the RSPO.			
Root Cause Analysis (filled by organization audited): There is no evidence that the RaCP was approved by the RSPO secretariat at the time of the initial audit.			
Correction (filled by organization audited): The company has obtained an approval report from the RSPO Secretariat regarding the RACP that has been fulfilled.			
Corrective Action (filled by organization audited): Report to the Certification Body on the fulfilled RaCP report from the RSPO Secretariat			
Assessor Evaluation and Conclusion (filled by auditor): Verification on August 11, 2021. Email Approval from RSPO (Alicia Khor) on 21 July 2021 stated that officially inform that with the satisfactory evaluation results of the compensation plan, the RaCP process for PT BIA is now completed. Based on the data above, it can be concluded that the non conformity No. 2020.06 is declared to have been fulfilled.			
Verified by	: Satria Adi Putra		

3.4.2. Opportunity for Improvement

No	Ref. Std.	Description
1	6.7.3	Companies are encouraged to ensure the use of PPE that has been provided to workers at each work location.
2	7.12.4	Ensure protection of HCV areas

3.4.3. Noteworthy Positive Components

No	Ref. Std.	Description
1	-	Has obtained ISPO certificate
2	-	The company's commitment to implementing sustainable standards for oil palm plantations.
3	-	Have a pattern of partnership cooperation in the development of community estate
4	-	Award certificate to PT Bio Inti Agrindo Clinic as the first Best Clinic for Non-Specialized Referral Ratio in 2020 by BPJS Kesehatan Merauke Regency.
5	-	Award certificate in the implementation of "blood donation" social service activities in the context of caring for others during the pandemic on July 3, 2020 with a total number of 332 participants by the Indonesian Red Cross, Merauke Regency.

3.4 Summary of Arising Issues from Public and Auditor Verification

Public Issues	Auditor Verification
<p>Labor Inspection Agency of Papua Province.</p> <p>There are no negative issues related to labor and child labor. P2K3 reporting has been given regularly by the company on a periodic basis (3 months), besides that it has also carried out a mandatory report on labor reports.</p> <p>Payment of wages has followed the provisions of IDR 3,500,500, - / month.</p> <p>The company has not yet recorded the outsourcing employees (service provision companies) to the Manpower Agency. Labor Agency has notified the company to identify the number of employees needed, especially harvesters.</p> <p>Aspirations:</p> <ul style="list-style-type: none"> • In order to the OHS report includes the number of units of heavy equipment and their types as well as operators that have an SIO (operator license). • Increase labor recruitment for local residents and be provided with appropriate training. 	<p>There are no negative issues regarding labor & child that need further verification. The company has paid wages in accordance with the regulations.</p> <p>In the <i>P2K3</i> Quarter II 2020 report, the SIO list, heavy equipment data and SIO attachments have been included.</p> <p>Papuan indigenous apprenticeship-based training in collaboration with the Merauke Regency Manpower and Transmigration Agency and PT BIA from September to December 2019 totaling 36 participants.</p> <p>Training for native Papuan workers on September 2-9, 2020, totaling 56 participants.</p> <p>Village monitoring training on February 27-28 ,2020 with the ecology, sustainability and PR team of PT BIA.</p>
<p>Head of Plantation Business Development of Merauke Province.</p> <p>Food Crops, Horticulture and Plantation Agency.</p> <p>Based on interview its known that:</p> <ul style="list-style-type: none"> • The company has sent mandatory reports such as plantation business progress reports, plantation business assessment reports and fire management reports. • Plantation Business Assessment has been carried out. 	<p>Unit management has sent mandatory reports and has legality documents (<i>IUP</i>, location permit and <i>HGU</i>).</p>



Public Issues	Auditor Verification
<ul style="list-style-type: none"> • There are no additions to location permits, <i>IUP</i> and <i>HGU</i>. • During 2019/2020 there were no land fires. <p>Aspirations:</p> <ul style="list-style-type: none"> • Increase plasma development to reach 20% of the company's <i>HGU</i>. • Socialization and guidance to customary land owners such as farming for plasma plantations and others. • Economic improvement for the communities around the company. 	<p>The minutes of the socialization regarding the location of plasma block I on March 15 2017, attended by local residents. The company shows a plan to increase the plasma area approved by the Plasma Estate Manager</p>
<p>Environmental Agency of Merauke Regency</p> <p>There are no negative issues related to environmental pollution. The company has compliance its obligations related to environmental licensing (EIA, permit of hazardous warehouse, LA permit), and mandatory reporting.</p>	<p>There are no negative issues that need to be verified. The company has compliance related environmental obligations such as licensing and mandatory reporting that has been explained in the related indicators.</p>
<p>Head of Land Disputes section, Merauke Regency.</p> <p>Based on interview show that:</p> <ul style="list-style-type: none"> • Unit management has sent a land use report every 1 year. • There is no additional <i>HGU</i>. • Every 3 months, the company sends a report to the <i>BPN</i> regarding the increase in land area, land issues, especially land disputes. • So far, there has never been any information or complaints from the community regarding disputes, conflicts and land claims. 	<p>There are no negative issues that need to be verified. The company has compliance related legalities obligations such as mandatory reporting and legalities documents (<i>IUP</i>, location permit and <i>HGU</i>).</p>
<p>Head of village and secretary of Mandekman Village.</p> <p>There is no negative issues, land dispute issues or environmental pollution. The land compensation process has been carried out by involving various parties.</p> <p>The company has made efforts to develop the surrounding community through CSR programs, the use of local labor and local contractors.</p> <p>The relationship between the company and the community has run quite well and harmoniously. Communication between the company and the village is quite good.</p>	<p>Unit management has shown land compensation documentary evidence carried out referring to the concept of FPIC.</p>

Public Issues	Auditor Verification
<p>Based on interview with Head of village & Secretary Mandekman village. There is a letter regarding a request for wood assistance for the construction of an office fence in 2019, but until now there is no response from the company.</p>	<p>But based on verification of auditor, the letter has been given to Public relation Staff and the PIC has been resign. The letter its not recorded because the PIC not give the letter to management. The representative was communicated with villagers and told them to make a letter again and give to related PIC.</p>
<p><i>Marga Mahuze Kewam (Kecamatan Muting), Marga Mahie Milafo (Desa Kindiki), Marga Basik-Basik.(Land previous owner)</i></p> <p>Based on interview show that:</p> <ul style="list-style-type: none"> • Unit management has provided CSR to the surrounding community. • Unit management has conducted outreach on protected areas (HCV) and types of protected flora and fauna. • During the 2019-2020 period, the company has compensated community land and there have been no land disputes, claims and conflicts. • During the 2019-2020 period, there were no land fires in company areas and community lands. <p>News articles in February 2020 by Pusaka (civil society organizations to conduct research and policy advocacy, promoting and defending the rights of indigenous peoples). At the end of December 2019, residents of <i>Kampung Sellil</i>, Ullilin District, Merauke Regency. Finding the Yawontop Sacred Forest (sacred and protected place of the Malind and Wambon Tekamerop tribes) has been lost and damaged. It is known that the company operator PT BIA has carried out the eviction of sacred forest (HCV area) located in the HCV area of Division II Estate A. It is known that this was due to an order from the Division II foreman to carry out cleaning in the watershed area from blocks 2-19 to 2- 25 in sacred forest locations.</p>	<p>The company has provided CSR and has shown land compensation documentary evidence carried out referring to the concept of FPIC.</p> <p>The company has documented complaints from the community and resolved complaints, with the following details.</p> <ul style="list-style-type: none"> • There is an official report of the demolition of the HCV area in block 2.24, Division 2, dated on December 19, 2019 regarding the chronology of demolition of the area. At that time, the excavator operator did not receive instructions from the foreman because the foreman was on annual leave and another foreman was helping harvest activities in Division 5. • There is guilty plea letter from the excavator operator dated January 4, 2019. • There is a report on the settlement of sacred land in the area, such as: <ul style="list-style-type: none"> - January 10, 2020, the customary fine for the sacred land of Marga Basik-Basik at Estate A. - January 10, 2020, the payment for <i>Tua adat</i> in the process of resolving the sacred land problem of Marga Basik-Basik. - 11 January 2020, additional compensation for the sacred land of Marga Basik-Basik Estate A. • There is evidence of handover of additional compensation funds for sacred land block 2-24 Estate A to the <i>Tua Adat</i> of Marga Basik-Basik on January 11, 2020 as well as a statement letter of Marga Basik-Basik position regarding this matter, declaring himself a representative of the Marga and firmly accepting apologies from the management of PT BIO.

Public Issues	Auditor Verification
<p>Aspirations:</p> <ul style="list-style-type: none"> The community hopes that there will be facilities for training local residents such as workshop techniques, making salted fish and others. Cooperation for rice and fuel cooperative activities with the surrounding community. Increase employment opportunities for local communities. Formation of a stakeholder team (PT BIA, Government and Community) but until now this team is not active, local people expect notification and invitation to the community if there is a visit from the Government Office. General company policies to be informed to the local community, for example regarding the COVID-19 pandemic (Lockdown area). 	<ul style="list-style-type: none"> There is a letter of clarification regarding the news by the Yayasan Pusaka Bentala Rakyat on January 16, 2020, inviting the Pusaka Bentala Rakyat Foundation and Linus Omba. There is an official report Number February 20, 2020 regarding a meeting with the parties for the restoration and rehabilitation of the HCV area in Estate A. Participants who attended, Head of Marga Basik-Basik, Chairperson of the Ullilin District LMA, Head of PT BIO, Environmental Agency Merauke Regency, Santo Antonius Merauke Foundation and <i>BBKSDA</i> Papua. <p>Field observations in the riparian Area block 2-24 Division II. The area has been rehabilitated, there has been planting of local plants and the riparian conditions have been left. There is information regarding the HCV area and there is an information board prohibiting destroying the area.</p> <p>Papuan indigenous apprenticeship-based training in collaboration with the Merauke Regency Manpower and Transmigration Agency and PT BIA from September to December 2019 totaling 36 participants.</p> <p>Training for native Papuan workers on September 2-9, 2020, totaling 56 participants.</p> <p>Village monitoring training on February 27-28 ,2020 with the ecology, sustainability and PR team of PT BIA</p>
<p>Marga Selil (customary leader) Selil Village (Land previous owner).</p> <p>News articles in February 2020 by Pusaka (civil society organizations to conduct research and policy advocacy, promoting and defending the rights of indigenous peoples). At the end of December 2019, residents of <i>Kampung Selil</i>, Ullilin District, Merauke Regency. Finding the Yawontop Sacred Forest (sacred and protected place of the Malind and Wambon Tekamerop tribes) has been lost and damaged. It is known that the company operator PT BIA has carried out the eviction of sacred forest (HCV area) located in the HCV area of Division II Estate A. It is known that this was due to an order from the Division II foreman to carry out cleaning in the watershed area from</p>	<p>The company has documented complaints from the community and resolved complaints, with the following details.</p> <ul style="list-style-type: none"> There is an official report of the demolition of the HCV area in block 2.24, Division 2, dated on December 19, 2019 regarding the chronology of demolition of the area. At that time, the excavator operator did not receive instructions from the foreman because the foreman was on annual leave and another foreman was helping harvest activities in Division 5. There is guilty plea letter from the excavator operator dated January 4, 2019. There is a report on the settlement of sacred land in the

Public Issues	Auditor Verification
<p>blocks 2-19 to 2- 25 in sacred forest locations.</p> <p>This incident caused losses to the community, including the loss of opportunities and disruption of the relations of the local indigenous people to carry out rituals and spiritual relationships. They worry that the damage and loss of sacred places will bring disaster to human life.</p> <p>Based on interview with the customary leader, Selil Village found that:</p> <ul style="list-style-type: none"> • The recovery process carried out by the company by planting sandalwood seedlings in the area. however, the customary leader requested that local plants be planted in the HCV (Keramat) area. • Giving compensation money to the community in the amount of IDR 20 million (divided each to the clan). • The customary leader felt dissatisfied with this, according to him this could trigger social jealousy between clans. 	<p>area, such as:</p> <ul style="list-style-type: none"> - January 10, 2020, the customary fine for the sacred land of <i>Marga Basik-Basik</i> at Estate A. - January 10, 2020, the payment for <i>Tua adat</i> in the process of resolving the sacred land problem of <i>Marga Basik-Basik</i>. - 11 January 2020, additional compensation for the sacred land of <i>Marga Basik-Basik</i> Estate A. <ul style="list-style-type: none"> • There is evidence of handover of additional compensation funds for sacred land block 2-24 Estate A to the <i>Tua Adat</i> of <i>Marga Basik-Basik</i> on January 11, 2020 as well as a statement letter of <i>Marga Basik-Basik</i> position regarding this matter, declaring himself a representative of the clan and firmly accepting apologies from the management of PT BIO. • There is a letter of clarification regarding the news by the Yayasan Pusaka Bentala Rakyat on January 16, 2020, inviting the Pusaka Bentala Rakyat Foundation and Linus Omba. • There is an official report Number February 20, 2020 regarding a meeting with the parties for the restoration and rehabilitation of the HCV area in Estate A. Participants who attended, Head of <i>Marga Basik-Basik</i>, Chairperson of the Uililin District LMA, Head of PT BIO, Environmental Agency Merauke Regency, Santo Antonius Merauke Foundation and <i>BBKSDA</i> Papua. <p>Field observations in the riparian Area block 2-24 Division II. The area has been rehabilitated, there has been planting of local plants and the riparian conditions have been left. There is information regarding the HCV area and there is an information board prohibiting destroying the area.</p>
<p>Chairman of the Plasma Cooperative Division 1 and owner of customary rights.</p> <p>(Mandok Sejahtera Plantation Cooperative (KPPSMS).</p> <p>Based on interview it is known that:</p> <ul style="list-style-type: none"> • Unit management and cooperatives already have an MoU (Memorandum of Understanding). • There were 342 cooperative members in October 2020 and already had <i>SHM</i>. • The plasma area of mature & immature area is 1500 ha (\pm 500 Estate A and \pm 1000 ha Estate C). • The cooperative has registered employees for insurance (<i>BPJS TK & KES</i>) and the wages have been adjusted to the Provincial Minimum Wage (driver 4 workers). • Work equipment and PPE are prepared by the 	<p>Unit management has good relations with plasma cooperatives.</p>

Public Issues	Auditor Verification
<p>cooperative.</p> <p>Aspirations:</p> <ul style="list-style-type: none"> Plasma development has not reached 20% of the Company's HGU. 	<p>The minutes of the socialization regarding the location of plasma block I on March 15 2017, attended by local residents. The company shows a plan to increase the plasma area approved by the Plasma Estate Manager.</p>
<p>Worker Union</p> <p>Interview with chairman of worker union and representatives of each estate found that:</p> <ul style="list-style-type: none"> The chairman is elected by the members, not with interference of the company management. Before the pandemic Covid-19, worker union held monthly meetings regularly Workers know the minimum wage given Worker union do socialization regarding PKB 	<p>There are no issues that need further verification regarding worker unions. Unit management has good relations with worker union.</p>
<p>Gender Committee</p> <p>Interviews with the gender committee:</p> <ul style="list-style-type: none"> The gender committee has identified the needs of new mothers through a questionnaire The gender committee has an socialization program for female workers on sexual harassment, family planning and child protection The gender committee also has collaboration with the Office of Women's Empowerment in carrying out their programs Socialization about the gender committee is routinely carried out because there are still many employees in the division who do not know the existence of the gender committee There have been cases of abuse against minors in 2018 and 2019, but these cases have been resolved in accordance with applicable regulations. 	<p>There are no issues that need further verification regarding the gender committee.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Bio Inti Agrindo Management Representative</p>  <p><u>Bae Gyutae Ph.D</u> Wednesday, 11 August 2021</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Leonada</u> Wednesday, 11 August 2021</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1.	Labor Inspection Agency of Papua Province	Papua Province	-	Interview by phone	14 October 2020	√	-
2.	Plantation Business Development Section Head of Merauke. Plantation business. Department of Food Crops, Horticulture and Plantation.	Merauke Regency, Papua Province	-	Interview by phone	14 October 2020	√	-
3.	Environmental Agency of Merauke	Merauke Regency, Papua Province	-	Interview by phone	14 October 2020	√	-
4.	Head of Village and secretary	Merauke Regency, Papua Province	-	Direct interview	14 October 2020	√	-
5.	<i>Marga Mahuze Kewam (Kecamatan Muting), Marga Mahie Milafo (Desa Kindiki), Marga Basik-Basik.</i>	Merauke Regency, Papua Province	-	Direct interview	14 October 2020	√	-
6.	<i>Marga Sellili (Ketua Adat) Desa Sellil.</i>	Merauke Regency, Papua Province	-	Direct interview	14 October 2020	√	-
7.	Chairman of the Plasma Cooperative Division 1 and owner of customary rights. Mandok Sejahtera Plantation Cooperative (KPPSMS).	Merauke Regency, Papua Province	-	Direct interview	14 October 2020	√	-
8.	Worker union	Merauke Regency, Papua Province	-	Direct interview	16 October 2020	√	-
9.	Gender committee	Merauke Regency, Papua Province	-	Direct interview	16 October 2020	√	-
10.	Estate A Spraying – 6 workers Fertilizing – 7 workers Harvesting – 3 workers	Merauke Regency, Papua Province	-	Direct interview	19 October 2020	√	-
11.	Plasma Divisi 1 Harvesting– 2 workers Spraying – 6 workers	Merauke Regency, Papua Province	-	Direct interview	19 Oktober 2020	√	-

Appendix 2. Assessment Program

Date	12 to 22 October 2020	
PROGRAM	AUDIT PROCESS	AUDITOR
Monday, 12 October 2020		
01.45 – 12.45	Travelling From Jakarta → Merauke	All Auditor
12.45 - 18.45	Merauke → Site (PT Bio Inti Agrindo)	All Auditor
Friday, 16 October 2020		
08.00 – 11.00	Opening Meeting Field Observation to POM 1 <ul style="list-style-type: none"> Process Station (Grading – despatch) related Safety Aspect and Worker Welfare Water Treatment Plant, Schedule Waste, Workshop, Chemical Storage WWTP, Leachate Water management Water Intake, Land Application Security Post, FFB receiving, CPO & PK Sending/SCCS Aspect) 	All Auditor <ul style="list-style-type: none"> SAP/LEO PUT/ BRP SSD
11.00 – 14.00	Break	All Auditor
14.00 – 17.00	Document Verification <ul style="list-style-type: none"> Verification of Basic Information Mill & Estate Confirmation Time Bound Plan Review of Partial Certification Verification documents for each aspect in accordance with P&C RSPO <i>Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier and Previous Land Owner</i>	All Auditor
Saturday, 17 October 2020		
08.00 – 12.00	Document Verification <ul style="list-style-type: none"> Verification of Basic Information Mill & Estate Confirmation Time Bound Plan Review of Partial Certification Verification documents for each aspect in accordance with P&C RSPO 	All Auditor
Sunday, 18 October 2020		
-	Break	All Auditor
Monday, 19 October 2020		
08.00 – 12.00	Field Observation to Estate A and Plasma Div.1 <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), Environment and Conservation/HCV Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application and etc) Observation of Workers Facilities (Housing, School, Worship Place) and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) 	<ul style="list-style-type: none"> SAP/LEO BRP/PUT SSD
12.00 – 14.00	Break	All Auditor

14.00 – 17.00	Document Verification <ul style="list-style-type: none"> • Verification of Basic Information Mill & Estate • Confirmation Time Bound Plan • Review of Partial Certification • Verification documents for each aspect in accordance with P&C RSPO 	All Auditor
Tuesday, 20 October 2020		
08.00 – 12.00	<i>Field Observation if Needed</i> Document Verification <ul style="list-style-type: none"> • Verification of Basic Information Mill & Estate • Confirmation Time Bound Plan • Review of Partial Certification • Verification documents for each aspect in accordance with P&C RSPO 	All Auditor
12.00 – 14.00	<i>Break</i>	All Auditor
14.00 – 17.00	Document Verification <ul style="list-style-type: none"> • Verification of Basic Information Mill & Estate • Confirmation Time Bound Plan • Review of Partial Certification • Verification documents for each aspect in accordance with P&C RSPO 	All Auditor
Wednesday, 21 October 2020		
08.00 – 10.00	Closing Meeting	All Auditor
10.00 – 15.00	Site (PT Bio Inti Agrindo) → Merauke	All Auditor
Thursday, 22 October 2020		
13.30 – 19.55	Travelling From Merauke → Jakarta	All Auditor