

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

Initial Assessment

Annual Surveillance Assessment (Choose an item.)

Recertification Assessment (Choose an item.)

Extension of Scope

<p>Client Company name (Parent Company): First Resources Limited</p>
<p>Client company Address: Head Office: APL Tower Central Park 28th Floor, Podomoro City Jl. Letjend S. Parman Kav.28, Grogol Petamburan, Jakarta Barat 11470, Indonesia</p>
<p>Certification Unit: PT Ketapang Agro Lestari – Ketapang Agro Lestari POM</p> <p>Location of Certification Unit: Kecamatan Siluq Ngurai, Kabupaten Kutai Barat, Provinsi Kalimantan Timur, 75771, Indonesia</p>
<p>Date of Final Report: 20/04/2022</p>

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	First Resources Limited		
RSPO Membership Number	1-0047-08-000-00	Membership Approval Date	10 March 2008
Address	APL Tower Central Park 28th Floor, Podomoro City, Jl. Letjend S. Parman Kav.28, Grogol Petamburan, Jakarta Barat – 11470, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Ketapang Agro Lestari – Ketapang Agro Lestari POM		
Location / Address	Kecamatan Siluq Ngurai, Kabupaten Kutai Barat, Provinsi Kalimantan Timur, 75771, Indonesia		
Website	www.first-resources.com		
Management Representative	Mr. Bambang Dwi Laksono	E-mail	bambang.dwilaksono@first-resources.com
Telephone	+62 21 2929 8888	Facsimile	+62 21 2929 8878

2. Certification Information			
Certificate Number	RSPO 757446	Certificate Start Date	20/04/2022
Date of First Certification	20/04/2022	Certificate Expiry Date	19/04/2027
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	Determination of the conformity of the client's management system, or parts of it, with audit criteria and evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input checked="" type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
-	-	-	-

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Ketapang Agro Lestari POM	Kecamatan Siluq Ngurai, Kabupaten Kutai Barat, Provinsi Kalimantan Timur, 75771, Indonesia	0° 52' 32.79" S	115° 53' 29.08" E
Ketapang Agro Lestari Estate	Kecamatan Siluq Ngurai, Kabupaten Kutai Barat, Provinsi Kalimantan Timur, 75771, Indonesia	0° 52' 32.79" S	115° 53' 29.08" E

Notes: The estate and mill office are in the same location (one building)

5. Description of Supply Bases					
New Planting Development	<input type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Ketapang Agro Lestari Estate	5,000.37	696.15	157.06	5,853.58	85.42
Total	5,000.37	696.15	157.06	5,853.58	85.42

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Ketapang Agro Lestari Estate	971.59	4,028.78	0	0	0	4,028.78	971.59
Total (ha)	971.59	4,028.78	0	0	0	4,028.78	971.59

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year	Actual		Forecast (April 2022 – March 2023)
		Previous license period	Current license period	
Ketapang Agro Lestari Estate	N/A	N/A	N/A	106,616.00
Total	-	-	-	106,616.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year	Actual		Forecast (April 2022 – March 2023)
		Previous license period	Current license period	
N/A		N/A	N/A	
Total		-	-	

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year	Actual		Forecast (April 2022 – March 2023)
		Previous license period	Current license period	
3 rd Party	N/A	N/A	N/A	106,291.00
Total	-	-	-	106,291.00

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (MT)	Volume of FFB from uncertified supply base (MT)	Total FFB/Month (MT)
	N/A	N/A	N/A	N/A
	TOTAL	-	-	-
Note: -				

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10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year	Actual		Forecast (April 2022 – March 2023)
	Previous license period	Current license period	
FFB	FFB		FFB
N/A	N/A	N/A	106,616.00 mt
CPO (OER: %)	CPO (OER: %)		CPO (OER: 25.41 %)
N/A	N/A	N/A	27,091.00 mt
PK (KER: %)	PK (KER: %)		PK (KER: 4.30 %)
N/A	N/A	N/A	4,584.00 mt

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
	N/A	N/A	N/A
TOTAL		-	-

11. Summary of Actual Volume sold					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	N/A	N/A	N/A	N/A	N/A
PK (MT)	N/A	N/A	N/A	N/A	N/A
Credits	N/A	N/A	N/A	N/A	N/A
Previous License period					
CPO (MT)	N/A	N/A	N/A	N/A	N/A
PK (MT)	N/A	N/A	N/A	N/A	N/A
Credits	N/A	N/A	N/A	N/A	N/A

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
TOTAL			-	-
Note:				

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

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	N/A	N/A	N/A
TOTAL		-	-

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

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year			Actual			Forecast		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period						
Credits				N/A	N/A	N/A
Physical	N/A	N/A	N/A			

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **18-21/10/2021**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **06/09/2021** ([https://rspo.org/uploads/default/pnc/RSPO_Public_Notification_IAV_PT_Ketapang_Agro_Lestari-Ketapang_Agro_Lestari_POM_\(Eng\).pdf](https://rspo.org/uploads/default/pnc/RSPO_Public_Notification_IAV_PT_Ketapang_Agro_Lestari-Ketapang_Agro_Lestari_POM_(Eng).pdf)).

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

The Critical NC close out on-site assessment was conducted on **8-9/03/2022**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Indonesia National Interpretation 2020 of the RSPO P&C 201 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Ketapang Agro Lestari POM	X	X	X	X	X
Ketapang Agro Lestari Estate	X	X	X	X	X

Tentative Date of Next Visit: January 9, 2023 - January 13, 2023

Total Number of Mandays: 14 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nanang Rusmana (NR)	Team Leader	<p>Education: Holds a Bachelor Degree of Forestry from IPB University.</p> <p>Work Experience: He has 8 years working experiences in oil palm plantation and mining sector and has more than 5 years auditing experience on RSPO and ISPO.</p> <p>Training attended: Completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, ISO 45001 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMETA requirements training, PAS2060, and Technical Training of Assessment of High Conservation Value Forest (HCVF).</p> <p>Aspect covered in this audit: During this assessment, he assessed on Best Management Practise for Mill and Estate, operation procedure, continuous improvement, long term business plan, supply chain for mill, time bound plan.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
Mujinius Jalaraya (MJ)	Team Member	<p>Education: Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Faculty of Forestry, Bogor Agricultural University (IPB).</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p>

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		<p>Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, RSPO endorsed RSPO P&C Lead Auditor course, RSPO endorsed RSPO SCCS Lead Auditor course, HCV Identification and management, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of HCV management and monitoring, Environmental management and monitoring, OHS</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
Edy Widodo (EW)	Team Member	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001: 2008 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001: 2004 training, Auditing ISO 14001: 2004 training, RSPO Endorsed RSPO Supply Chain Certification Lead Auditor Course, RSPO Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, High Conservation Value (HCV) Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of transparency, company policy, social and labor. He also conducted public consultation with related stakeholders.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
Dr. Suhaili Bin Sahari	Peer Reviewer	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. Occupation Health & Safety 3. ISO 14001:2015 Standard

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		4. RSPO Standards: RSPO P&C 2018 MY-NI 2019 5. MSPO Standards: MS 2530:2013 part 1, 2, 3 and 4 6. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 7. HACCP MS 1480:2019 8. GAP Standard: Global GAP, Euro GAP 9. ASI Peer Reviewer training
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Accompanying Persons:

Name	Role
Pratama Agung Sedayu	Qualifying Reviewer

2.3. Assessment Plan

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

Date	Time	Subjects	NR	MJ	EW
Monday, 18/10/2021	08.00 – 08.30	Opening Meeting - Presentation by PT. Ketapang Agro Lestari – Ketapang Agro Lestari POM & Supply bases - Presentation by BSI Indonesia	√	√	√
	08.30 – 12.00	Document Review Ketapang Agro Lestari POM & Estate: - Occupational Health and Safety, HCV, Environment Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, Stakeholder consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan.	√	√	√
	09.00 – 15.00	Stakeholders consultation: Local Government of Kutai Barat Regency (DLH, Disbun, Disnakertrans, DPMPTSP & BPN), Village Head, surrounding community, previous land owner/user, NGO, contractors.			√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Audit Continue for document review Ketapang Agro Lestari POM and Estate.	√	√	√
Tuesday, 19/10/2021	08.00 – 12.00	Field Visit to Ketapang Agro Lestari Estate: - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc.	√	√	√

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		<ul style="list-style-type: none"> - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labor Union and Gender Committee. 			
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Field Visit to Ketapang Agro Lestari POM: <ul style="list-style-type: none"> - Inspection of processing, warehouse, workshop, mill wastes management, effluent ponds, OHS, environment issues, POME application, workers interview, Supply Chain for CPO mill, review on SEIA documents and records, document review, etc. - Audit Supply Chain for CPO Mills (RSPO SCCS) - Interview workers. 	√	√	√
Wednesday, 20/10/2021	08.00 – 12.00	Audit Continue for document review Ketapang Agro Lestari POM and Estate.	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Audit Continue for document review Ketapang Agro Lestari POM and Estate.	√	√	√
Thursday, 21/10/2021	08.00 – 10.00	Audit Continue for document review Ketapang Agro Lestari POM and Estate.	√	√	√
	10.00 – 11.00	Report Preparation	√	√	√
	11.00 – 12.00	Closing Meeting	√	√	√

NCR Close Out Assessment Plan

Date	Time	Subjects	NR
Tuesday, 08/03/2022	08.00 – 08.30	Opening Meeting <ul style="list-style-type: none"> - Presentation by PT. Ketapang Agro Lestari – Ketapang Agro Lestari POM & Supply bases - Presentation by BSI Indonesia 	√
	08.30 – 12.00	Ketapang Agro Lestari Estate and Ketapang Agro Lestari POM Verifying of correction, root-cause and corrective action (interview, document review and field observation)	√
	12.00 – 14.00	Break	√
	14.00 – 17.00	Ketapang Agro Lestari Estate and Ketapang Agro Lestari POM Verifying of correction, root-cause and corrective action (interview, document review and field observation)	√
Wednesday, 09/03/2022	08.00 – 10.45	Ketapang Agro Lestari Estate and Ketapang Agro Lestari POM Verifying of correction, root-cause and corrective action (interview, document review and field observation)	√

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	10.45 – 11.15	Report Preparation	√
	11.15 – 12.00	Closing Meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. First Resources Limited included 33 management units, comprise of estates and mills.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>No. Not all estates and mills certified within five (5) years after obtaining RSPO membership. However below are the justifications:</p> <ul style="list-style-type: none"> • RSPO membership 10th March 2008. • First Resources Limited’s timebound plan begin with target year to implement RSPO P&C on 2018 – 2023. • BSI noted First Resources Limited issued with suspension related to the certification of other management unit under its subsidiary. • These events led to certification postponement for First Resources Limited and its subsidiaries. BSI have performed the RSPO Initial Certification Assessment Visit for PT. Meridan Sejatisurya Plantation on 29 June – 2 July 2015. However, upon successful certification recommendation, RSPO P&C certificate cannot be issued – as restricted out by RSPO. • The first timebound plan was to start 2015 up to 2024. Due to complaint case for First Resources Ltd. (parent company) in RSPO, causing the parent company unable to progress/fulfil the timebound plan for RSPO certification within the management units for three years (2015-2017). Therefore the certification targets planned for 2015-2017 cannot be achieved. • First Resources Ltd. have permission to start certification process in 17 April 2018: “The Complaints Panel notes that First Resources has accepted the liability calculation by the Compensation Panel, and thereby have met the 1st milestone by completing the Land Use Change Analysis (LUCA). • Accordingly, the Complaints Panel determines that the suspension related to the certification of the other management units of First Resources, aside from PT Limpah Sejahtera, is lifted. First Resources may proceed with their certification process. 	Complied

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	<ul style="list-style-type: none"> • Notwithstanding, while proceeding with the certification process, First Resources is required to meet the 2nd (Approval of compensation concept note by the Compensation Panel) and 3rd (Approval of Remediation and Compensation Plan by the Compensation Panel) milestones no later than 6 months from the date of endorsement of the LUCA by the Compensation Panel. Failure to do so will be viewed severely and may lead to the suspension and eventual termination of membership.” • RSPO issued another suspension to First Resources Limited certification process from March 2019 and lifted in February 2020 due to an RSPO Complaint for PT. Limpah Sejahtera. (Letter form RSPO – Chairperson of the RSPO Complaints Panel, dated 17th February 2020, subject: Re-Complaints Panel’s Decision on the Request for the Lifting of the Suspension of the Certification Process of PT Limpah Sejahtera and all uncertified management unit) 	
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.</p>	<p>No, there is new acquisition in the latest timebound plan submitted by First Resources Limited in 15 August 2019 to RSPO.</p>	<p>Complied</p>
<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>Yes. First Resources Limited demonstrate latest timebound plan changes to RSPO Secretariat in 15 August 2019.</p> <p>First Resources Limited’s revised the timebound plan in August 2021.</p> <p>Dated 7 October 2021, FR limited has received the email form RSPO Secretary, the statement is: Based on internal discussion and agreement, RSPO agree to approve the revised time bound plan for First Resources to certify all of its management units beyond the period of 5 years after membership, and based on the new planned year of certification as per attached...”.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes, there is changes in the First Resources Limited’s timebound plan.</p> <p>First Resources Limited demonstrate latest timebound plan changes to RSPO Secretariat in 15 August 2019.</p> <p>First Resources Limited submitted ACOP 2020 Report on 11 May 2021. The report has reviewed for the consistency.</p>	<p>Complied</p>

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<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Yes, there is no isolated lapse identified.</p> <p>First Resources Limited submitted the latest timebound plan changes to RSPO Secretariat in 15 August 2019. Based on the revised timebound plan, RSPO P&C certification of PT. Subur Arum Makmur, PT. Surya Intisari Raya, PT. Panca Surya Agrindo – was planned in 2019 and missed. P&C certification of PT. Perdana Intisawit Perkasa, PT. Limpah Sejahtera, PT. Swadaya Mukti Prakarsa – was planned for 2020 and missed.</p> <p>First Resources provides explanation:</p> <p>a. RSPO Complaints Panel issued letter to First Resources Limited, 11 March 2019 – RSPO Complaints Panel is putting suspension on First Resources Limited’s subsidiaries, PT. Limpah Sejahtera and suspension of further certification processes of all other uncertified management units.</p> <ul style="list-style-type: none"> - <i>Section 3 On the basis of Aforesaid, the complaints Panel hereby directs the following: 3.1 The LUCA dated 2 February 2018 and the Final Conservation Liability be made null and void, and the RaCP process is deferred; 3.2 The Respondent shall submit the latest Soil Survey, The Peat Management Plan and copies of land permits for independent review, no later than 10 working days from date of this letter; 3.3 On the basis of the above (3.2) review, it shall be determined if an on-site verification will be required to determine the depth of the peat area already planted; 3.4 Subject to the completion of 3.2 and 3.3 , and on-site verification if required, the RSPO Secretariat will engage an independent GIS consultant to conduct a fresh LUCA based on the information provided and the 2017 Kesatuan Hidrologis Gambut (KHG) indicative peat maps. Cost oof the same to be borne by the Respondent. The remediation and compensation process to resume subsequently.”</i> - <i>Section 4 In light of the fact that the LUCA is deemed null and void, the Respondent’s compliance in meeting Milestone 1 in the 11 April 2017 decision of Complaints Panel is considered ineffective. Thus the suspension of the certification process of PT. Limpah Sejahtera remains in force; and the suspension of further certification processes of all other uncertified management units is reinstated.</i> 	<p>Complied</p>
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	<p><i>Lifting of suspension is subject to completion of activities under clause 3.4 above.</i></p> <p>b. RSPO Complaints Panel issued letter to First Resources Limited, 17 February 2020 – RSPO Complaints Panel is lifting suspension on First Resources Limited’s subsidiaries, PT. Limpah Sejahtera and lifting suspension of certification processes of all other uncertified management units.</p> <p>- <i>Section 5 Upon taking of the above into consideration, take note that the Complaint Panel hereby allows the Respondent’s request for the lifting of the suspension of the certification process of First Resources Limited and its subsidiaries effective from the date of this letter and subject to the strict adherence of the following self-imposed conditions by the Respondents: 5.1 The Respondents shall accept the decision by the Compensations Panel on the FCL and the environmental remediation; and 5.2 the Respondent shall give full commitment to continue the next stage of RaCP;</i></p> <p>c. COVID-19 pandemic starting from early 2020, cannot perform onsite audit.</p>	
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No, there was no fundamental failure such as unable to justify delay in planning the assessment. The parent company demonstrates willingness to move forward and certifying the subsidiaries.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>BSI noted there was a violation against RSPO P&C 7.12 in First Resources Limited’s subsidiary. It was issued with liability under RSPO Remediation and Compensation Procedure. First Resources demonstrate a letter from RSPO Complaint Panel in April 2018:</p> <p>“The Complaints Panel notes that First Resources has accepted the liability calculation by the Compensation Panel, and thereby have met the 1st milestone by completing the Land Use Change Analysis (LUCA).</p> <p>Accordingly, the Complaints Panel determines that the suspension related to the certification of the other management units of First Resources, aside from PT Limpah Sejahtera, is lifted. First Resources may proceed with their certification process.</p> <p>Notwithstanding, while proceeding with the certification process, First Resources is required to</p>	<p>Complied</p>

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	<p>meet the 2nd (Approval of compensation concept note by the Compensation Panel) and 3rd (Approval of Remediation and Compensation Plan by the Compensation Panel) milestones, no later than 6 months from the date of endorsement of the LUCA by the Compensation Panel. Failure to do so will be viewed severely and may lead to the suspension and eventual termination of membership.”</p> <p>BSI noted First Resources Limited demonstrates commitment to comply with RSPO prerequisites prior to continuing with RSPO P&C certification process.</p>	
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>First Resources Limited demonstrate effort to comply with RSPO requirements for New Planting Procedures, for new plantings since 1 January 2010. Sample seen: PT. Mitra Karya Sentosa in June 2014; PT. Ketapang Agro Lestari in 2012 (TUV Nord); PT. Borneo Persada Energy Jaya in 2012 (TUV Nord);</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p> <p><i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported. Please refer to BSI-RSPO Secretariat approval.</i></p>	<p>There was no land conflict noted, based on audit team verification to RSPO Case Tracker, RSPO RaCP Tracker, Social Media and Internet browsing.</p> <p>Audit team checked the RSPO RaCP Tracker to confirm for any land conflicts/liabilities. Audit team found RSPO RaCP Tracker stating First Resources Limited has 5 Management Units with Potential Liability; 5 LUCA submitted; 2 LUCA review completed; 4 Concept Note Required; 0 Concept Note Submitted; 0 Concept Note Approved; 0 Compensation Plan Submitted; 0 Compensation Plan Endorsed; 4 Remediation Plan Required; 0 Remediation Plan Submitted; 0 Remediation Plan Approved.</p> <p>First Resources Limited indicating they have submitted the LUCA, responded to LUCA review and submitting Concept Note (where liability identified). The 5 Management Units: PT. Borneo Surya Mining Jaya: LUCA review completed; no compensation & remediation required. PT. Limpah Sejahtera: LUCA review completed; Concept Note under review process – including remediation plan. PT. Gerbang Sawit Indah: LUCA submitted and under review process. PT. Panca Surya Agrindo: LUCA submitted and under review process. PT. Swadaya Mukti Pratama: LUCA submitted and under review process.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Based on review upon internal audit report from uncertified management unit of</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> - PT. Borneo Persada Energy Jaya, Internal audit report November 2020, according to the internal audit report company has stated the positive assurance: there are no significant labor disputes, no violation against criterion 4.2, so the conclusion is PT Borneo Persada Energy Jaya has met the RSPO audit criteria; - PT. Ketapang Agro Lestari, Internal audit report November 2020, according to the internal audit report company has stated the positive assurance: there are no significant labor disputes, no violation against criterion 4.2, so the conclusion is PT Ketapang Agro Lestari has met the RSPO audit criteria; - PT. Umekah Sari Pratama, Internal audit report November 2020, according to the internal audit report company has stated the positive assurance: there are no significant labor disputes, no violation against criterion 4.2 so the conclusion is PT Umekah Sari Pratama has met the RSPO audit criteria; - PT. Perdana Intisawit Perkasa, Internal audit report March 2021, according to the internal audit report company has stated the positive assurance: there are no significant labor disputes, no violation against criterion 4.2 so the conclusion is PT Perdana Intisawit Perkasa has met the RSPO audit criteria; - PT. Surya Intisari Raya, Internal audit report March 2021, according to the internal audit report company has stated the positive assurance: there are no significant labor disputes, no violation against criterion 4.2 so the conclusion is PT Surya Intisari Raya has met the RSPO audit criteria; <p>Audit team checked the RSPO website, no labor dispute complaint recorded for subsidiaries/un-certified management unit under First Resources Limited.</p>	
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Based on review upon internal audit report from uncertified management unit of</p> <ul style="list-style-type: none"> - PT. Borneo Persada Energy Jaya, Internal audit report November 2020, according to the internal audit report company has stated the positive assurance: there is no legal non-compliance/criterion 2.1, so the conclusion is PT Borneo Persada Energy Jaya has met the RSPO audit criteria; - PT. Ketapang Agro Lestari, Internal audit report November 2020, according to the internal audit 	<p>Complied</p>

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	<p>report company has stated the positive assurance: there is no legal non-compliance/criterion 2.1, so the conclusion is PT Ketapang Agro Lestari has met the RSPO audit criteria;</p> <ul style="list-style-type: none"> - PT. Umekah Sari Pratama, Internal audit report November 2020, according to the internal audit report company has stated the positive assurance: there is no legal non-compliance/criterion 2.1, so the conclusion is PT Umekah Sari Pratama has met the RSPO audit criteria; - PT. Perdana Intisawit Perkasa, Internal audit report March 2021, according to the internal audit report company has stated the positive assurance: there is no legal non-compliance/criterion 2.1, so the conclusion is PT Perdana Intisawit Perkasa has met the RSPO audit criteria; - PT. Surya Intisari Raya, Internal audit report March 2021, according to the internal audit report company has stated the positive assurance: there is no legal non-compliance/criterion 2.1, so the conclusion is PT Surya Intisari Raya has met the RSPO audit criteria; <p>Audit team checked the RSPO website, no complaint related to legal compliance recorded for subsidiaries/un-certified management unit under First Resources Limited.</p>	
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Based on review upon internal audit report from uncertified management unit of</p> <ul style="list-style-type: none"> - PT. Borneo Persada Energy Jaya, Internal audit report November 2020, concluded no legal non-compliance; - PT. Ketapang Agro Lestari, Internal audit report November 2020, concluded no legal non-compliance; - PT. Umekah Sari Pratama, Internal audit report November 2020, concluded no legal non-compliance; - PT. Perdana Intisawit Perkasa, Internal audit report March 2021, concluded no legal non-compliance; - PT. Surya Intisari Raya, Internal audit report March 2021, concluded no legal non-compliance; <p>According to the internal audit report, company has stated the positive assurance: there is no legal non-compliance/ RSPO P&C criterion 2.1 4.2, 4.4,</p>	<p>Complied</p>

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	<p>4.5, 4.6, 4.7, 4.8 and 7.12, so the conclusion is PT. Borneo Persada Energy Jaya, PT. Ketapang Agro Lestari, PT. Umekah Sari Pratama, PT. Perdana Intisawit Perkasa, PT Perdana Intisawit Perkasa and PT. Surya Intisari Raya has met the RSPO audit criteria</p> <p>Audit team checked the RSPO website, no complaint related to legal compliance recorded for subsidiaries/un-certified management unit under First Resources Limited.</p>	
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>Based on review upon internal audit report from uncertified management unit of</p> <ul style="list-style-type: none"> - PT. Borneo Persada Energy Jaya, Internal audit report November 2020, stipulated no Critical NC identified against criterion 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12; - PT. Ketapang Agro Lestari, Internal audit report November 2020, stipulated no Critical NC identified against criterion 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12; - PT. Umekah Sari Pratama, Internal audit report November 2020, stipulated no Critical NC identified against criterion 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12; - PT. Perdana Intisawit Perkasa, Internal audit report March 2021, stipulated no Critical NC identified against criterion 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12; - PT. Surya Intisari Raya, Internal audit report March 2021, stipulated no Critical NC identified against criterion 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12; <p>There is violation against 7.12 in uncertified management unit PT. Limpah Sejahtera. This has been raised into RSPO Complaint Panel. First Resources Limited actively addressed the issues raised: sending latest soil survey, the peat management plan, copies of HGU certificates to RSPO Secretariat on 8 April 2019; carried out Independent Review on 25 July 2019 by Prof. Dr. Azwar Maas from Gadjah Mada University, Yogyakarta, Indonesia; Send out refreshed LUCA in October 2019.</p> <p>Sighted RSPO Complaints Panel letter dated 17 February 2020 stipulated "Complaints Panel hereby allows the Respondents request for the lifting of suspension of the certification process pf First Resources Limited and its subsidiaries ..."</p>	<p>Complied</p>

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	<p>Audit team checked the RSPO Case Tracker, 3 active complaints related to First Resources Limited and its subsidiaries:</p> <p>RSPO/2020/12/EN</p> <ul style="list-style-type: none"> • Update in case tracker dated 23 June 2021: "The Complaints Desk has uploaded the advertisement on the website and has requested the Communication team to distribute the information onto social media." • Related link "advertisement": https://rspo.org/news-and-events/tenders/call-for-proposal-environmental-impact-assessment-expert-reviewer. • Referring to the advertisement above, RSPO has chosen their independent reviewer. <p>RSPO2021/04/EN</p> <ul style="list-style-type: none"> • Update in case tracker dated 23 June 2021: "Two CP members agreed for the Complaints Desk to follow up with the membership unit. Pending approval from other CP members, endorsement will be sent via email." • First Resources Limited is waiting for information from RSPO. <p>RSPO/2021/07/SW</p> <ul style="list-style-type: none"> • Update in case tracker dated 23 June 2021: "The CP notes the Bilateral Engagement process and requested the Complaints Desk to explain to both Parties to take the necessary steps to avoid the activities that can jeopardize the BE process" • First Resources Limited had just started Bilateral Engagement stage with Complainant. 	
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Audit team wanted to conduct stakeholder consultation upon 3 active complaints in RSPO Case Tracker. However, all of the active complaints stated the complainant as "Confidential".</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are</p>	<p>PT Ketapang Agro Lestari has scheme smallholders. This is initial certification audit, the requirement will be verified in the next audit (ASA)</p>	<p>Complied</p>

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not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.		
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Approved Time Bound Plan

No	Unit name	Mill (YES or NO)	Location	Current RSPO TBP	Approved revised RSPO TBP
1	PT Arindo Trisejahtera	YES	Riau, Indonesia	2018	2018 - certified
2	PT Meridan Sejatisurya Plantation	YES	Riau, Indonesia	2018	2018 - certified
3	PT Subur Arum Makmur	YES	Riau, Indonesia	2019	2020 - certified
4	PT Surya Intisari Raya	YES	Riau, Indonesia	2019	2021 – audited Stage 2
5	PT Perdana Intisawit Perkasa	YES	Riau, Indonesia	2020	2021 – audited Stage 2
6	PT Ketapang Agro Lestari	YES	Kalimantan Timur, Indonesia	2021	2021 – audited Stage 2
7	PT Limpah Sejahtera	YES	Kalimantan Barat, Indonesia	2020	2022 – waiting RaCP (concept note)
8	PT Panca Surya Agrindo	YES	Riau, Indonesia	2019	2023 – LUCA in review process
9	PT Swadaya Mukti Prakarsa	YES	Kalimantan Barat, Indonesia	2020	2023 – LUCA in review process
10	PT Mitra Karya Sentosa 2	NO	Kalimantan Barat, Indonesia	-	2022
11	PT Citra Agro Kencana	YES	Kalimantan Timur, Indonesia	2023	2022
12	PT Borneo Persada Energy Jaya	NO	Kalimantan Timur, Indonesia	2023	2022
13	PT Borneo Surya Mining Jaya	NO	Kalimantan Timur, Indonesia	2022	2022
14	PT Umekah Sari Pratama	YES	Kalimantan Barat, Indonesia	2022	2023
15	PT Mitra Karya Sentosa 1	YES	Kalimantan Barat, Indonesia	2023	2023
16	PT Muriniwood Indah Industry	YES	Riau, Indonesia	2021	2023
17	PT Ciliandra Perkasa	YES	Riau, Indonesia	2022	2023
18	PT Subur Arum Makmur 2	YES	Riau, Indonesia	2023	2024
19	PT Perdana Intisawit Perkasa 2	YES	Riau, Indonesia	2023	2024
20	PT Meridan Sejatisurya	YES	Riau, Indonesia	2023	2024

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	Plantation - BA				
21	PT Priatama Riau	NO	Riau, Indonesia	2023	2024
22	PT Falcon Agri Persada	NO	Kalimantan Barat, Indonesia	2023	2024
23	PT Setia Agrindo Mandiri	YES	Riau, Indonesia	2021	2025
24	PT Surya Dumai Agrindo	NO	Riau, Indonesia	2023	2025
25	PT Pulau Tiga Lestari Jaya	NO	Kalimantan Barat, Indonesia	2023	2025
26	PT Borneo Ketapang Permai	NO	Kalimantan Barat, Indonesia	2023	2025
27	PT Gerbang Sawit Indah	NO	Riau, Indonesia	2022	2025
28	PT Indogreen Jaya Abadi	NO	Riau, Indonesia	2021	2026
29	PT Setia Agrindo Lestari	NO	Riau, Indonesia	2021	2026
30	PT Citra Palma Kencana	NO	Riau, Indonesia	2021	2026
31	PT Karya Tama Bakti Mulia	NO	Riau, Indonesia	2023	2026
32	PT Bumi Sawit Perkasa	NO	Riau, Indonesia	2023	2026
33	PT Maha Karya Bersama	NO	Kalimantan Timur, Indonesia	2023	2026

Reasons to extend RSPO TBP

- Suspension of FR's certification process from Mar 2019-Feb 2020 due to an RSPO Complaint
- COVID-19 pandemic starting from early 2020
- Increase of number of mills from 15 mills in 2018 to 18 mills in 2020
- Hak Guna Usaha (HGU) not yet obtained for seven PTs Note: First P&C certificate received in 2018

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were **8 (eight) Critical (onsite)** and **13 (thirteen) of Minor nonconformities (onsite)** and **0 (zero) Opportunity for Improvement was raised**. The **PT Ketapang Agro Lestari – Ketapang Agro Lestari POM** Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2119896-202110-M1	Date Issued	21/10/2021
Due Date	20/10/2022	Date of nonconformity Closure	09/03/2022
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 3.6.1 (Critical)		
Statement of Nonconformity:	There is no risk assessment has been conducted and mitigation plan for agrochemical mixing activity in the field/warehouse.		
Requirement Reference:	All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	PT Ketapang Agro Lestari has assessed and identify the risk for mill and estate operation as per “Identifikasi Sumber Bahaya dan Pengendalian Resiko” updated January 2021, mitigation plan for the risk analysis has been determined and documented. However, there is no risk assessment and mitigation plan for agrochemical mixing activity in the field/warehouse.		
Corrections:	Carry out hazard source identification of Risk control for agrochemical mixing activities both in warehouse and field.		
Root Cause Analysis:	The identification of activities by the OHS Officer of PT. KAL is not optimal, so that the breakdown of activities is still missed.		
Corrective Actions:	Review and update HIRAC/ISBPR document in accordance with the activities in the company on a regular basis (at least once a year). OHS Officer together with P2K3 Management disseminated the HIRAC/ISBPR document to the workers.		
Assessment Conclusion:	NCR Close Out Visit on 08-09 March 2022: Based on NCR Close Out Verification, certificate holder has shown the CAP’s evidence as follows: <ul style="list-style-type: none"> • The latest review of HIRAC/ISBPR document is available on 8 November 2021. The updated of ISBPR document on 8 November 2021 has included a Risk Assessment and Mitigation Plan for agrochemical mixing activity in the field/warehouse. • The latest of HIRAC/ISBPR document socialization is available, socialization is carried out to all department of the organization, for example on 18 November 		

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	<p>2021 has been carried out for all supervisor (harvesting, spraying, upkeep, analysis and maintenance supervisor)</p> <ul style="list-style-type: none"> Based on the results of interviews with the Chemical Warehouse Clerk / Central Warehouse and Spraying Workers at Afd II Block-C45 it was known that Spraying Workers has known the hazard and the risk control of the agrochemical mixing activities. <p>Based on that evidence, this Major NC's has been closed.</p>
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Non-conformity			
NCR Ref #	2119896-202110-M2	Date Issued	21/10/2021
Due Date	20/10/2022	Date of nonconformity Closure	09/03/2022
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 3.6.2 (Critical)		
Statement of Nonconformity:	H&S plan to address health and safety risks to people was not effectively monitored.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<p>During field visit to workshop mill, found unsafe condition: 2 welder equipment is connected to electricity but there is no welder operator on site. One of the welder equipment connected to the electricity without standard connector, only wires attached to the plug/socket.</p> <p>During field visit to workshop mill area, found unsafe condition where there is an excavated pond that is deep enough and waterlogged but not given a barrier.</p> <p>During field visit to Dispatch Pump House and Thresher St. found rotating object are not equipped with safety cover.</p>		
Corrections:	<ol style="list-style-type: none"> Repairing electrical installation for welding activity according to safety standards. Install safety cover for rotating objects at the Dispatch Pump and Thresher Station location. Install guard fence and warning boards at excavated pond near Mill's Workshop area. 		
Root Cause Analysis:	<ul style="list-style-type: none"> Lack of workers understanding regarding to save working conditions both in terms of work equipment and the environment in the workplace area. The implementation and monitoring/inspection of OHS at PT KAL has not yet been carried out by supervisor (mandor) in the field. 		
Corrective Actions:	<ul style="list-style-type: none"> Socialization related to save working conditions according to SOP FR.OSH.P18_Standard Pemantauan_revisi 0 to the workers who are responsible for the workplace area. Carry out Regular OHS Inspection (monthly) by OHS Officer, inspections related to OHS condition at PT KAL. 		
Assessment Conclusion:	NCR Close Out Visit on 08-09 March 2022:		

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	<p>Based on NCR Close Out Verification, certificate holder has shown the CAP's evidence as follows:</p> <ul style="list-style-type: none"> • The evidence of safe working condition socialization on 8 November 2021 at PT KAL was available, socialization was attended by Asisten, Mandor, Askep, operator, helper, analysis, sample boy, and maintenance. • Monthly OHS Inspection results are available (form FR.OSH.P18-01/1-0/01-09-2011) on 27 November 2021, 26 December 2021, 29 January 2022 and 26 February 2022 that has conducted by the Inspector (Workshop Assistant and Warehouse Assistant), the result of inspection shown that the electrical installation for welding is in accordance with the safety standard, the rotating object has equipped by safety cover, workplace area has met the work safety requirements. • Field verification has carried out at mill's workshop area known that electrical installation is in accordance with the safety standard and at mill's area the rotating object has equipped by safety cover. • Interviews was carried out to the mechanics and was known that mechanics has known the safe working conditions in the welding process. Interviews with the operators at mill also showed the same thing, they already understood to the safe working condition. • Furthermore, field verification in the mill's workshop area showed that the excavated pond has equipped by guard fence, the excavated pond will be made an additional septic tank. <p>Based on that evidence, this Major NC's has been closed.</p>
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Non-conformity			
NCR Ref #	2119896-202110-M3	Date Issued	21/10/2021
Due Date	20/10/2022	Date of nonconformity Closure	09/03/2022
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 3.8.5- Supply Chain requirements for mills (Critical)		
Statement of Nonconformity:	Documented Procedure "Mekanisme Rantai Pasok RSPO" FR.CSM.MRPR Rev.01 dated 20 December 2018 has no completed and up to date covering the implementation of all the elements of the supply chain model requirements.		
Requirement Reference:	<p>Documented procedures:</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>a) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>b) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p>		

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	c) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.
Objective Evidence:	Based on document review SOP "Mekanisme Rantai Pasok RSPO" FR.CSM.MRPR Rev.01 dated 20 December 2018. It was known that SOP has not explained in detail the day limit in informing certificates status when suspended or terminated to their supply chain clients.
Corrections:	Adding the information related to the day limit in informing certificates status when suspended or terminated to their supply chain clients in the WI-M-OP-001 revision on 16 November 2021 (WI-M-OP-001 is a part of the SOP "Mekanisme Rantai Pasok RSPO" FR.CSM.MRPR Rev.01 dated 20 December 2018).
Root Cause Analysis:	Lack of thoroughness in observing the requirements stipulated in the RSPO Certification System.
Corrective Actions:	<ul style="list-style-type: none"> • Sustainability Corporate and Region communicate information and this latest SCCS information and procedure to the Marketing Department as an entry or exit of point for information to/from suppliers and buyers. • Carried out review of SOP in relation with the standard changes.
Assessment Conclusion:	<p>NCR Close Out Visit on 08-09 March 2022:</p> <p>Based on NCR Close Out Verification, certificate holder has shown the CAP's evidence as follows:</p> <ul style="list-style-type: none"> • WI-M-OP-001 revision on 16 November 2021 has available explain related to the day limit in informing certificates status when suspended or terminated to their supply chain clients as stated at point 3.8 "Jika sertifikat ditangguhkan atau diakhiri, baik dikarenakan adanya tindakan perbaikan yang kurang efektif atau tidak dilaksanakan dengan memuaskan, maka perusahaan harus berhenti mengklaim produk bersertifikat sejak tanggal diakhiri atau ditangguhkan sertifikat dan harus menginformasikan hal tersebut kepada konsumen / pelanggan dalam waktu 3 (tiga) hari kerja". • The evidence of socialization from Sustainability Corporate Region related to information and latest SOP/WI SCCS to the Marketing Department and Mill unit PT KAL was available as mentioned in the Berita Acara Distribusi Dokumen dan Tanda Dokumen WI-M-OP-001 dated 22 November 2021 accepted by Marketing Manager (Jap Kha Wui) and on 24 November 2021 accepted by Mill Manager (Satri P Tarigan) submitted by Traceability Officer (Indra Zulkarnain) • SOP review was carried out in relation to the changes of standard carried out by updating WI-M-OP-001 dated 16 November 2021, this WI is part of SOP "Mekanisme Rantai Pasok RSPO" FR.CSM.MRPR Rev.01 dated 20 December 2018. <p>Based on that evidence, this Major NC's has been closed.</p>

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Non-conformity			
NCR Ref #	2119896-202110-M4	Date Issued	21/10/2021
Due Date	20/10/2022	Date of nonconformity Closure	09/03/2022
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 6.2.2 (Critical)		
Statement of Nonconformity:	<p>Based on the verification of the “Perjanjian Kerja Waktu Tidak Tertentu” (PKWTT) document at PT Ketapang Agro Lestari there is a work contract:</p> <p>a) PKWTT Work agreement an AKAD employee has not been renewed in accordance with the Employee Recruitment procedure no. AD.PNK.HRD.R&S.0002.001.</p> <p>b) The Work Agreement has not been explained in detail regarding working hours, working days, overtime, the right to vacation and maternity leave in accordance with the laws and regulations.</p>		
Requirement Reference:	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.		
Objective Evidence:	<p>Based on employee recruitment procedure No. AD.PNK.HRD.R&S.0002.001, that the AKAD (Antar Kerja Antar Daerah) Work Agreement will not be extended if its validity period has expired, but if the worker still wants to continue the working relationship with the company, a new work agreement letter with the status of Karyawan Harian Tetap (KHT) will be issued.</p> <p>Some workers are recruited using AKAD (Antar Kerja Antar Daerah) with an AKAD Work Agreement with a probationary period of 3 months and then after appointment a Perjanjian Kerja Waktu Tidak Tertentu (PKWTT) is made. However, it has not been explained in detail related to working hours, working days, overtime, the right to vacation and maternity leave in accordance with statutory regulations, for example:</p> <ul style="list-style-type: none"> • Perjanjian Kerja Waktu Tidak Tertentu No. 041/PKWTT/IV-2017 dated 6 April 2017 on behalf of Muhammad Nur Malik. • Perjanjian Kerja Waktu Tidak Tertentu No. 027/PKWTT/VII-2017 dated 12 July 2017 on behalf of Ester Sosa. 		
Corrections:	<ul style="list-style-type: none"> • The Balikpapan Bord of Director’s Office withdraws the Work Agreement Letter/SPK on site and communicates with the KTU Site that SPK format used is the SPK format which issued by the Balikpapan Bord of Director’s Office. • The Balikpapan Bord of Director’s Office conducted socialization to KTU Site related to Company Regulation/PP and Work Agreement Letter/SPK. 		
Root Cause Analysis:	<ul style="list-style-type: none"> • Agreement Letter shown at the time of the audit (which is on site) is different in format from the Agreement Letter that issued by Balikpapan Bord of Director’s Office, and the auditee could not explain that actually the AKAD workers recruited by PT KAL since the beginning, their status as a Permanent Worker (PKWTT Agreement) after 3 months probationary period. • The auditee could not explain that the provisions related to working hours, working days, overtime, the right to vacation and maternity leave has been 		

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	regulated in the Company Regulation/Peraturan Perusahaan for period 2019-2021.
Corrective Actions:	The HRD Manager for Kalimantan Timur Region conduct socialization to the personalia department and Administration Head (KTU) at Unit PT KAL in relation of provisions and format of the latest PKWTT Agreement document and Company Regulation/PP and their amendments.
Assessment Conclusion:	<p>NCR Close Out Visit on 08-09 March 2022: Based on NCR Close Out Verification, certificate holder has shown the CAP's evidence as follows:</p> <ul style="list-style-type: none"> • There is evidence of communication from the Balikpapan Bord of Director's Office to the KTU Site in the form meeting minutes on 20 November 2021 at Meeting Room Kantor Besar PT KAL. <ul style="list-style-type: none"> - Understanding of the latest UU Cipta Kerja which explains the UU Cipta Kerja and its implementation in the company. - The latest Work Agreement Letter for the workers, has explained that the SPK PKWTT/AKAD using the existing Work Agreement Letter at the Balikpapan Bord of Director's Office, the existing Work Agreement Letter which already in Management Unit can be destroyed to avoid confusion on the next time, and Management Unit team must ensure that all workers in the core process must have permanent workers (PKWTT/KHT) and daily worker (KHL) is only allowed for supporting work. • There is evidence of socialization from Balikpapan Bord of Director's Office to the Management Unit (KTU Site) related to Company Regulation/Peraturan Perusahaan and Work Agreement Letter/SPK. The PP period 2019-2021 has explained the rights of workers as follows: Working hours are regulated in article 17, working days are regulated in article 17, overtime is regulated in article 18, the right to vacation and maternity leave are regulated in article 32 and 33. • Interviews has been conducted with the HRD Manager Balikpapan Bord of Director's Office and KTU Site revealed that the site format of Work Agreement Letter/SPK is not valid and has been withdrawn. <p>Based on that evidence, this Major NC's has been closed.</p>

Non-conformity			
NCR Ref #	2119896-202110-M5	Date Issued	21/10/2021
Due Date	20/10/2022	Date of nonconformity Closure	09/03/2022
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 6.2.4 (Critical)		
Statement of Nonconformity:	The company has not carried out laboratory checks on the quality standards of clean water used by PT Ketapang Agro Lestari employees		
Requirement Reference:	The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of		

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	acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.
Objective Evidence:	<p>The company provides clean water facilities to employees from WTP at the PKS, the clean water is used by employees for MCK (Mandi Cuci Kakus) activities or not for consumption, but it has not been proven that the clean water source has been carried out laboratory analysis according Permenkes No. 32 Tahun 2017 concerning "Standar mutu kesehatan lingkungan dan persyaratan kesehatan air untuk keperluan hygiene sanitasi, kolam renang, slus per aqua dan pemandian umum".</p> <p><i>Pasal 2;</i></p> <p><i>"(1) Setiap Penyelenggara wajib menjamin kualitas Air untuk Keperluan Higiene Sanitasi, air untuk Kolam Renang, air untuk SPA, dan air untuk Pemandian Umum, yang memenuhi Standar Baku Mutu Kesehatan Lingkungan dan Persyaratan Kesehatan."</i></p>
Corrections:	Performing clean water analysis according to Permenkes No. 32 Tahun 2017 which used by workers to the KAN Accredited Laboratories.
Root Cause Analysis:	Management of PT KAL does not yet understand the obligations related to the requirements for fulfilling Clean Water quality standards which used by workers even though pH parameter is in accordance with the requirements.
Corrective Actions:	<ul style="list-style-type: none"> • The region Sustainability Team performing socialization to the Management Unit related to regulation of Clean Water quality standards for the workers. • Performing clean water analysis according to Permenkes No. 32 Tahun 2017 on a regular basis (yearly).
Assessment Conclusion:	<p>NCR Close Out Visit on 08-09 March 2022:</p> <p>Based on NCR Close Out Verification, certificate holder has shown the CAP's evidence as follows:</p> <ul style="list-style-type: none"> • The company has conducted clean water analysis on 3 November 2021 according to Permenkes No. 32 Tahun 2017 which used by workers to the KAN Accredited Laboratories namely Laboratorium Lingkungan PT Global Environment Laboratory, Samarinda, Kalimantan Timur which KAN accredited (KAN register No. LP-1181-IDN). Clean Water Analysis Result (No. 166/LHU/AB/GEL/X/2021 dated 3 November 2021) has available during NCR Close Out visit, the parameters that has been analysed was in accordance and meet with the quality standard of the Permenkes No. 32 Tahun 2017. • The evidence of socialization from Sustainability Team – Region Balikpapan to the Management Unit PT KAL related to the regulation of clean water quality standards was available during NCR Close Out visit as stated at the Socialization Documents on 8 November 2021 and 29 November 2021, the minutes meeting and attendance list already available. <p>Based on that evidence, this Major NC's has been closed.</p>

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Non-conformity			
NCR Ref #	2119896-202110-M6	Date Issued	21/10/2021
Due Date	20/10/2022	Date of nonconformity Closure	09/03/2022
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 6.5.2 (Critical)		
Statement of Nonconformity:	There is no evidence that a Policy to protect the reproductive rights of all has been communicated to all levels of the workforce.		
Requirement Reference:	A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.		
Objective Evidence:	<p>A policy to protect the reproductive rights of all, especially of women are available in Decree of the Board No: 011.D/SUSTAINABILITY_FR/P/VI/2012 regarding Protection of Reproductive Rights Policy" dated 15 June 2012, signed by CEO.</p> <p>However, there is no evidence that the policy has been communicated to all level of the workforce.</p> <p>During interview with female fertilizer workers confirmed that they don't aware/understand about reproductive right.</p>		
Corrections:	Perform re-socialization to the all workers related to the Reproductive Right Protection Policy and document it.		
Root Cause Analysis:	The documents of socialization in not stored properly in the unit.		
Corrective Actions:	Refresh socialization on a regularly (yearly) related to the Reproductive Right Protection Policy and document it.		
Assessment Conclusion:	<p>NCR Close Out Visit on 08-09 March 2022:</p> <p>Based on NCR Close Out Verification, certificate holder has shown the CAP's evidence as follows:</p> <ul style="list-style-type: none"> • There is evidence of socialization (minutes meeting and attendance list) from Management Unit to all workers related to the Reproductive Right Protection Policy, for example socialization on 20 November 2021 at Afdeling II that was attended by 84 workers. • Interview has been carried out to the fertilizer workers at Afdeling III Block E45 revealed that the workers has understood related to the Reproductive Right Protection Policy. <p>Based on that evidence, this Major NC's has been closed.</p>		

Non-conformity			
NCR Ref #	2119896-202110-M7	Date Issued	21/10/2021
Due Date	20/10/2022	Date of nonconformity Closure	09/03/2022
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 6.7.3 (Critical)		

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Statement of Nonconformity:	During field visit found that sampled workers are not use appropriate personal protective equipment (PPE) as per HIRAC document.
Requirement Reference:	Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.
Objective Evidence:	<p>During field visit to the spraying activity at block B74 found that Driver TUS only use face mask and not chemical mask. In addition, at Afdeling IV Block B51 found that 2 spraying workers were not wearing masker, hand gloves and apron during working.</p> <p>During field visit to Ketapang Agro Lestari POM found that welder is not wearing the PPE hand gloves during welding at Press Station.</p>
Corrections:	Provide PPE according to the type of work and HIRAC to the spraying workers (operators and driver) and Welding Operators at Mill.
Root Cause Analysis:	The implementation and monitoring/inspection of OHS at PT KAL has not been carried out by supervisors (mandor) in the field.
Corrective Actions:	<ul style="list-style-type: none"> • Conduct regular socialization during morning cycle to the workers related to the correct use of PPE. • Conduct regular OHS inspection (monthly) related to the use of PPE.
Assessment Conclusion:	<p>NCR Close Out Visit on 08-09 March 2022:</p> <p>Based on NCR Close Out Verification, certificate holder has shown the CAP's evidence as follows:</p> <ul style="list-style-type: none"> • There is evidence Bukti Acara Serah Terima Alat Pelindung Diri (APD) to the spraying workers (operators and driver) and Welding Operators at Mill, submissions are made on 1 October 2021, as follows: <ul style="list-style-type: none"> - Yanti, the PPE submitted: helmet, protective glasses, gloves, apron, safety boot and mask. - Yustina Susana Saun, the PPR submitted: helmet, protective glasses, gloves, apron, safety boot and mask. • There is evidence of socialization (minutes meeting and attendance list) from the Management Unit to all workers related to the correct use of PPE at workplace area, for example the socialization was carried out on 18 November 2021 to all spraying workers and mill workers. • There is evidence regarding Monthly OHS Inspection for period November 2021, December 2021, January 2022, February 2022 by OHS officer, the inspection result shown that workers have used PPE properly. • Interview has carried out with spraying workers at Afdeling II Block C45 and visit to Mill PT KAL, it is observed that workers are already using the appropriate PPE. <p>Based on that evidence, this Major NC's has been closed.</p>

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Non-conformity			
NCR Ref #	2119896-202110-M8	Date Issued	21/10/2021
Due Date	20/10/2022	Date of nonconformity Closure	09/03/2022
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 7.2.10 (Critical)		
Statement of Nonconformity:	There is not demonstrated that specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions.		
Requirement Reference:	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.		
Objective Evidence:	There is not demonstrated that specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions.		
Corrections:	Identifying targets for workers who must perform a medical check up namely spraying workers, mandor and chemical warehouse clerk.		
Root Cause Analysis:	Management Unit does not yet understand the Medical Check Up requirements, specially for the spraying workers.		
Corrective Actions:	<ul style="list-style-type: none"> • Sustainability Team – Region Kalimantan Timur socialization the SOP FR.OSH.P21_Pemantauan Pemeriksaan Kesehatan Karyawan_revisi 0 to the Management Unit PT KAL. • Conducting MCU regularly according to the SOP (for spraying workers every 6 month). 		
Assessment Conclusion:	<p>NCR Close Out Visit on 08-09 March 2022:</p> <p>Based on NCR Close Out Verification, certificate holder has shown the CAP's evidence as follows:</p> <ul style="list-style-type: none"> • Management Unit has identified targets for the workers who must perform Medical Check Up as stated in the Offering Letter of MCU from the Klinik Utama Permata Husada Kutai Barat on 3 November 2021 for Cholinesterase, audiometry and spirometry. • There is evidence of socialization (minutes meeting and attendance list) related to the Medical Check Up, the socialization is conducted to the all department in management unit, for example on 18 November 2021 was conducted to the all spraying workers and mill workers. • There is evidence of Medical Check Up for spraying workers that has conducted on 20 November 2021, the result of cholinesterase analysis shown normal condition, as follows: <ul style="list-style-type: none"> - Yanti, Analysis results 8.736, normal limits 3.930-10.800, description "normal". - Yustina, Analysis results 9.865, normal limits 3.930-10.800, description "normal". - Agustinus, Analysis results 7.630, normal limits 4.620-11.500, description "normal". • Interview to the spraying workers at Afdeling II Block C45 revealed that they had conducted MCU on 20 November 2021 in collaboration with the Klinik Utama Permata Husada Kutai Barat. <p>Based on that evidence, this Major NC's has been closed.</p>		

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Non-conformity			
NCR Ref #	2119896-202110-N1	Date Issued	21/10/2021
Due Date	20/10/2022	Date of nonconformity Closure	09/03/2022
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 3.2.2 (Minor)		
Statement of Nonconformity:	PT. Ketapang Agro Lestari – Ketapang Agro Lestari POM and its supply base cannot provide filled up/completed RSPO metrics template prior to an RSPO Certification.		
Requirement Reference:	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during annual surveillance assessment by using the RSPO metrics template.		
Objective Evidence:	PT. Ketapang Agro Lestari – Ketapang Agro Lestari POM and its supply base cannot provide filled up/completed RSPO metrics template prior to an RSPO Certification.		
Corrections:	Submit the RSPO Metrics Template in accordance with the provisions of the RSPO Secretariat prior to the audit.		
Root Cause Analysis:	Lack of communication and coordination related to the data synchronization between the Sustainability Corporate and the Region Balikpapan Office to fulfill the documents required in filling out the RSPO Metrics Template.		
Corrective Actions:	Communicating and coordinating via email the data requirements between Sustainability Corporate and Region Balikpapan Office earlier to ensure that the Metrics Template can be completed prior to the audit.		
Assessment Conclusion:	<p>NCR Close Out Visit on 08-09 March 2022: Based on NCR Close Out Verification, certificate holder has shown the CAP's evidence as follows:</p> <ul style="list-style-type: none"> • There is evidence of the RSPO Metrics Template version 2.1 PT Ketapang Agro Lestari. • There is evidence of communication via email regarding the data required for RSPO Metrics Template between Sustainability Corporate and Balikpapan Regional Office, the communication via email was carried out on 16 November 2021 according to available evidence. <p>Based on that evidence, this minor NC's has been closed.</p>		

Non-conformity			
NCR Ref #	2119896-202110-N2	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 5.1.1 (Minor)		

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Statement of Nonconformity:	Based on interview with the Head of KUD Plasma "Koperasi Serba Usaha Sempakat Penawang Lendian Sejahtera", it was known that prices for FFB has not available and accessible by smallholders.
Requirement Reference:	Current and previous period prices for FFB are publicly available and accessible by smallholders.
Objective Evidence:	Based on interview with the Head of KUD Plasma "Koperasi Serba Usaha Sempakat Penawang Lendian Sejahtera", it was known that prices for FFB has not available and accessible by smallholders.
Corrections:	The information regarding the FFB prices will be communicated in facilities that can be accessed to smallholders such as posted at the Information Board at the KUD Office.
Root Cause Analysis:	There is no means of communication that can be accessed by smallholder.
Corrective Actions:	Periodically will update information regarding of FFB Prices and communicated on the facilities that can be accessed by smallholders.
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.

Non-conformity			
NCR Ref #	2119896-202110-N3	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 5.1.8 (Minor)		
Statement of Nonconformity:	PT. Ketapang Agro Lestari has not prepared mutual agreement to support independent smallholder for certification.		
Requirement Reference:	The unit of certification supports independent smallholders with certification, where applicable, ensuring mutual agreement between the unit of certification and the smallholder on who runs the Internal Control System (ICS), who holds the certificate, and who owns and sells certified materials.		
Objective Evidence:	PT. Ketapang Agro Lestari has not prepared mutual agreement to support independent smallholder for certification.		
Corrections:	PT KAL disseminated the RSPO certification to the Village Government of Ring 1 or those that coincided with the company and Identifying the presence of Independent Smallholders and making a mutual agreement to support independent smallholder for certification.		
Root Cause Analysis:	PT KAL has not identified the presence of independent stallholders around ring 1.		
Corrective Actions:	Identify the presence of independent smallholders and fulfill RSPO requirements related to Principle 5 – Support Smallholders Inclusion and create a program if independent smallholders are identified.		
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.		

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Non-conformity			
NCR Ref #	2119896-202110-N4	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 5.2.1 (Minor)		
Statement of Nonconformity:	PT. Ketapang Agro Lestari has not consulted smallholders (irrespective of type) to support and improve their livelihood and their interest in RSPO certification.		
Requirement Reference:	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.		
Objective Evidence:	PT. Ketapang Agro Lestari has not consulted smallholders (irrespective of type) to support and improve their livelihood and their interest in RSPO certification.		
Corrections:	Identifying the presence of independent smallholders around ring 1 village.		
Root Cause Analysis:	PT KAL has not identified the presence of independent stallholders around ring 1.		
Corrective Actions:	Fulfilling the RSPO requirements related to Principle 5 – Support Smallholders Inclusion and create a needs assessment and create a program of independent smallholders to improve their livelihoods and their interest in RSPO certification if independent smallholders are identified.		
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.		

Non-conformity			
NCR Ref #	2119896-202110-N5	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 5.2.2 (Minor)		
Statement of Nonconformity:	PT. Ketapang Agro Lestari has not implemented livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).		
Requirement Reference:	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).		
Objective Evidence:	PT. Ketapang Agro Lestari has not prepared smallholder improvement programmes and PT. Ketapang Agro Lestari has not implemented livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).		

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Corrections:	Fulfilling the RSPO requirements related to Principle 5 – Support Smallholders Inclusion and making smallholders improvement programs if independent smallholders are identified.
Root Cause Analysis:	PT KAL has not identified the presence of independent stallholders around ring 1.
Corrective Actions:	Identifying the presence of independent smallholders around ring 1 village.
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.

Non-conformity			
NCR Ref #	2119896-202110-N6	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 5.2.3 (Minor)		
Statement of Nonconformity:	PT. Ketapang Agro Lestari has not provided support to promote legality of FFB production.		
Requirement Reference:	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.		
Objective Evidence:	PT. Ketapang Agro Lestari has not provided support to promote legality of FFB production.		
Corrections:	Identifying the presence of independent smallholders around ring 1 village.		
Root Cause Analysis:	PT KAL has not identified the presence of independent smallholders around ring 1 village.		
Corrective Actions:	Fulfilling the RSPO requirements related to Principle 5 – Support Smallholders Inclusion and create smallholder improvement program related to promote legality of FFB production if independent smallholders are identified.		
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.		

Non-conformity			
NCR Ref #	2119896-202110-N7	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 5.2.5 (Minor)		
Statement of Nonconformity:	PT. Ketapang Agro Lestari has not performed regular review and public report on the progress of the smallholder support programme.		
Requirement Reference:	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.		
Objective Evidence:	PT. Ketapang Agro Lestari has not performed regular review and public report on the progress of the smallholder support programme.		

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Corrections:	Identifying the presence of independent smallholders around ring 1 village.
Root Cause Analysis:	PT KAL has not identified the presence of independent stallholders around ring 1.
Corrective Actions:	Fulfilling the RSPO requirements related to Principle 5 – Support Smallholders Inclusion if independent smallholders are identified, the company conduct regularly reviews and publicly reports on the progress of the smallholder support programme.
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.

Non-conformity			
NCR Ref #	2119896-202110-N8	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 6.3.3 (Minor)		
Statement of Nonconformity:	There is no evidence that formation or operation of registered labour organizations freely elected representatives for all workers, including migrant and contract workers.		
Requirement Reference:	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.		
Objective Evidence:	According to the organisation of labour organization (LKS Bipartite) noted that organization member consists of 5 person representative of Company management and 3 person representative of workers/labour. According to the requirement or provision from Manpower Office of Kutai Barat Regency stated that LKS Bipartite should be 1 : 1 between management and workers.		
Corrections:	Revise the LKS Bipartite Structure and report the latest LKS Bipartite Structure to the Manpower Office of Kutai Barat Regency for recording.		
Root Cause Analysis:	Management Unit does not yet understand related to requirements or the provisions of the Manpower Office of Kutai Barat Regency stated that the LKS Bipartite must be 1:1 between management and workers.		
Corrective Actions:	Socialization related to LKS Bipartite regulations by HRD to workers and staff of PT KAL.		
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.		

Non-conformity			
NCR Ref #	2119896-202110-N9	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 6.5.3 (Minor)		

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Statement of Nonconformity:	No evidence that management has assessed the needs of new mother effectively and taken action to address the needs that have been identified.
Requirement Reference:	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.
Objective Evidence:	PT Ketapang Agro Lestari has been assessed the needs of new mother in consultation with the new mother as per "Identifikasi Kebutuhan Ibu Baru di PT KAL". However, based on interview with female fertilizing workers, confirmed that they don't aware about the circular letter that company provide a time (1 hour) for breastfeeding. During filed visit and interview with fertilizing workers (YL), she still working as a fertilizing worker when she was in breastfeeding for her child when age 3 month. Based on new mother identification report shown that most of respondent not from new mother (only 8 new mother respondent and the rest is not new mother 62 person). While according to data from clinic there were more than 20 new mothers identified.
Corrections:	<ul style="list-style-type: none"> Update the identification of the new number of new mothers in PT KAL Identify and determine the needs of new mothers with respondents who represent the number of new mothers.
Root Cause Analysis:	Asistant Afdeling, Mandor and women workers who work in the spraying and fertilizer activity do not understand related to Company Policies regarding the needs of new mother and the lack of supervision from the unit.
Corrective Actions:	KTU unit conducts socialization of company policies for new mothers to Assistant Afdeling, mandor and women workers on regular basis (yearly)
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.

Non-conformity			
NCR Ref #	2119896-202110-N10	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 6.5.4 (Minor)		
Statement of Nonconformity:	There is no evidence that a grievance mechanism, which respects anonymity and protects complainants has been communicated to all levels of the workforce.		
Requirement Reference:	A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.		
Objective Evidence:	There is no evidence that the policy has not been communicated to all levels of workforce. During interview with workers confirmed that they have not understand and aware regarding the policy and grievance mechanism which was respects anonymity and protects complainants where requested.		

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Corrections:	Management unit conducts socialization of company procedure regarding handling of complaint in the SOP Communication.
Root Cause Analysis:	The socialization has been carried out partially and not completely for all workers.
Corrective Actions:	Management unit conducts socialization related to SOP Complaints which respects anonymity and protects complainants with a system that is understood and easily remembered by workers and is evaluated every 6 months by the KTU unit.
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.

Non-conformity			
NCR Ref #	2119896-202110-N11	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 6.7.2 (Minor)		
Statement of Nonconformity:	There is no assigned operatives trained in first aid are present in both field and other operations		
Requirement Reference:	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Objective Evidence:	Company has provided the first aid equipment both in field or worksite and other operation, however there is no assigned operatives trained in first aid are present in both field and other operations.		
Corrections:	Conducts First Aid training for the officers assigned to first aid to be present in the field and other operations.		
Root Cause Analysis:	It has not yet been clearly established for officers assigned to first aid to be present in the field and other operations.		
Corrective Actions:	To appoint and assign officers assigned to first aid to be present in the field and other operations and to be provided with regular first aid training.		
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.		

Non-conformity			
NCR Ref #	2119896-202110-N12	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 7.2.8 (Minor)		
Statement of Nonconformity:	During field visit to landfill found that some ex chemical container disposed not properly as per regulation.		

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Requirement Reference:	7.2.8 All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.
Objective Evidence:	During field visit at landfill area found that some ex chemical container are disposed in to the landfill (TPSA).
Corrections:	Cleaned the landfill area from several used chemical and delivered to Hazardous Waste Warehouse on 22 October 2021.
Root Cause Analysis:	Lack of supervision from supervisor/mandor and assistant regarding the handling of Hazardous Waste in the workplace area.
Corrective Actions:	Assistant and mandor carried out socialization related to handling of Hazardous Waste in the workplace area. Perform monitoring/inspection in the workplace area by Assistant on regular basis together with the monthly OHS inspection.
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.

Non-conformity			
NCR Ref #	2119896-202110-N13	Date Issued	21/10/2021
Due Date	Next Audit (ASA1)	Date of nonconformity Closure	Next Audit (ASA1)
Clause & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 7.3.2 (Minor)		
Statement of Nonconformity:	It was found that waste material disposal are not in accordance with company procedures.		
Requirement Reference:	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>PT Ketapang Agro Lestari prepared a procedure to handle waste material including hazardous waste under "SOP Manajemen Limbah Nomor: FR.CSM.OP.1 Rev. 2" dated 30 December 2018.</p> <p>During field visit to landfill it was found that some ex agrochemical container (5 pcs), ex used oil container (1 pcs) and 1 pcs ex insecticide container (baygon) disposed into the landfill.</p> <p>During field visit to Dispatch Pump House found disposal of used oil filter. It was found that ex chemical container "EON Chemical Solution" was use as a rubbish bin near to the weighbridge.</p> <p>It was found that ex engine oil "CAT DEO 15W-40" was use as a rubbish bin near to engine room.</p>		
Corrections:	Cleaned the workplace area from several used chemical and delivered to Hazardous Waste Warehouse on 22 October 2021.		
Root Cause Analysis:	Lack of supervision from supervisor/mandor and assistant regarding the handling of Hazardous Waste in the workplace area.		
Corrective Actions:	Assistant and mandor carried out socialization related to handling of Hazardous Waste in the workplace area.		

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	Perform monitoring/inspection in the workplace area by Assistant on regular basis together with the monthly OHS inspection.
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.3.1 Status of Nonconformities Previously Identified and Observations

Nil

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
IAV				
2119896-202110-M1	Major	3.6.1	21/10/2021	Closed on 09/03/2022
2119896-202110-M2	Major	3.6.2	21/10/2021	Closed on 09/03/2022
2119896-202110-M3	Major	3.8.5	21/10/2021	Closed on 09/03/2022
2119896-202110-M4	Major	6.2.2	21/10/2021	Closed on 09/03/2022
2119896-202110-M5	Major	6.2.4	21/10/2021	Closed on 09/03/2022
2119896-202110-M6	Major	6.5.2	21/10/2021	Closed on 09/03/2022
2119896-202110-M7	Major	6.7.3	21/10/2021	Closed on 09/03/2022
2119896-202110-M8	Major	7.2.10	21/10/2021	Closed on 09/03/2022
2119896-202110-N1	Minor	3.2.2	21/10/2021	Closed on 09/03/2022
2119896-202110-N2	Minor	5.1.1	21/10/2021	Next Audit (ASA1)
2119896-202110-N3	Minor	5.1.8	21/10/2021	Next Audit (ASA1)
2119896-202110-N4	Minor	5.2.1	21/10/2021	Next Audit (ASA1)
2119896-202110-N5	Minor	5.2.2	21/10/2021	Next Audit (ASA1)
2119896-202110-N6	Minor	5.2.3	21/10/2021	Next Audit (ASA1)
2119896-202110-N7	Minor	5.2.5	21/10/2021	Next Audit (ASA1)
2119896-202110-N8	Minor	6.3.3	21/10/2021	Next Audit (ASA1)

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2119896-202110-N9	Minor	6.5.3	21/10/2021	Next Audit (ASA1)
2119896-202110-N10	Minor	6.5.4	21/10/2021	Next Audit (ASA1)
2119896-202110-N11	Minor	6.7.2	21/10/2021	Next Audit (ASA1)
2119896-202110-N12	Minor	7.2.8	21/10/2021	Next Audit (ASA1)
2119896-202110-N13	Minor	7.3.2	21/10/2021	Next Audit (ASA1)

3.4 Stakeholders and previous land owner / user consultation

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

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Workers of PT Ketapang Agro Lestari – Ketapang Agro Lestari POM	Workers during field visit	Face to face interview
LKS Bipartit	Bima	Face to face interview
Environmental Service Kutai Barat Regency	H. Makulau	By phone
Agriculture Service Kutai Barat Regency – Plantation Department	Suko Relawan	By phone
Manpower Service Kutai Barat Regency	Asrin	By phone
Manpower Service Kalimantan Timur Province	Asniawati	By phone
National Lands Body Kutai Barat Regency	Roshid	By phone
Head of Gender Committee of KAL Estate	Marda Datu Bua	Face to face interview
Head of Lendian Village	Edi Suriadinata	Face to face interview

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Koperasi Serba Usaha Sempekot Penawangan Lendian Sejahtera	Nius	Face to face interview
FFB Transporter	Khoirun	Face to face interview
Dewan Adat Dayak Kalimantan Timur	Lampang Bilung	Face to face interview
Previous Land Owner	Edi Suriadinata, Nius, Yotam M, Rintonati, Samiq	Face to face interview

Stakeholders comment	
<p>Dinas Perkebunan, Peternakan dan Perikanan Kabupaten Kutai Barat</p>	<p>Feedbacks:</p> <ul style="list-style-type: none"> • There are no complaints from the surrounding community related to PT KAL's plantation activities • Has obtained "Kelas Kebun" <p>Issues:</p> <p>There is a partnership pattern with the village community around the plantation covering an area of 1,474.3261 Ha, but the report on the realization of the development of the partnership has not yet been submitted to the Plantation Office of Kutai Barat Regency.</p> <hr/> <p>Audit Team verification and response:</p> <p>The assessment of the operational stage of the "Kelas Kebun" was carried out in 2019 period by the Dinas Perkebunan, Peternakan dan Perikanan Kabupaten Kutai Barat and determination of plantations class based on the Decree of the Regent of Kutai Barat No. 529.29/K.1108/2019 on 5 November 2019 with the category of class II.</p> <p>PT KAL ensures to make and submit reports on the progress of the realization of facilitation for the construction of surrounding community gardens to the relevant government agencies (Plantation Service) on a regular basis</p> <p>Verification has been carried out based on the "Kelas Kebun", based on the Decree of the Kutai Barat Regent No. 529.29/K.1108/2019 dated 5 November 2019 regarding the determination of the plantations class with the category of class II.</p> <p>Based on an interview with the head of the Plantation Office Kutai Barat Regency, that PT KAL has not submitted a Report of the Realization of Community Plantation Development Facilities.</p> <p>The company has maintained good management of occupational and social policy, all feedback from Dinas Perkebunan, Peternakan dan Perikanan Kabupaten Kutai Barat are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>
<p>Dinas Kerja Propinsi Kalimantan Timur</p>	<p>Feedbacks:</p> <ul style="list-style-type: none"> • PT KAL has formed safety committee (P2K3), has been endorsed/approved by Disnakertrans Provinsi Kalimantan timur, currently still valid and appropriate. As long as there are no changes to the P2K3 structure, there is no need to update the decree. But if there is a change even though the the change of member must be revised. • P2K3 report, smoothly reported every quarter by the company. • Periodic inspection is carried out at least once a year: work norms/regulation and OHS. • There are no reports of fatal accidents since the last year at PT KAL. • So far there are no reports of violations and cases of OHS norms and regulation.

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	<ul style="list-style-type: none"> • So far, no reports of industrial grievance or complaint submitted to Disnakertrans Provinsi Kalimantan Timur by workers/stakeholder. • The production equipment has been checked and tested on 30/09/2021 by PT Dohmon Jaya, the results of the inspection show all are good but the letter of the feasibility test result has not been issued. PJK3 is determined by the company, must comply with the following requirements: PJK3 must still be valid, have K3 experts (electric AK3, steam aircraft, etc.). • Testing of PT KAL's work environment by Balai K3 or PJK3 has been carried out. Routine monitoring has been carried out by the company. As long as the workplace criteria are included, the work environment measurement must be carried out. Done at least once a year. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - PT Ketapang Agro Lestari has formed the Safety Committee (P2K3) which has been registered and approved by Manpower and Transmigration Office Kalimantan Timur Province as per "Keputusan Kepala Dinas tenaga Kerja dan Transmigrasi Provinsi Kalimantan Timur Nomor: KEP.566/2183/P2K3/PPK/DTKT/2021 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Ketapang Agro Lestari" dated 27 September 2021". - Report of P2K3 and OHS performance has been reported regularly each quarter. Record of accident are available in "Monitoring Kecelakaan Kerja" PT Ketapang Agro Lestari 2021. Report of accident period January – December 2020 are available. Each accident case were followed up by investigation as record in "PT KAL Accident Report" wich explain the detail of accident case and chronology. Accident report are review in regular basis each month through P2K3 meeting. Record of P2K3 meeting can be demonstrated during audit, sample seen: P2K3 meeting dated 29/07/2021, 29/08/2021, 29/09/2021 discussing the OHS programme implementation, accident report, and other issue related to OHS. - PT Ketapang Agro Lestari has demonstrated the record of realization the OHS program 2020/2021 including work environment monitoring result.
<p>Dinas Tenaga Kerja Kabupaten Kutai Barat</p>	<p>Feedbacks:</p> <ul style="list-style-type: none"> • In general, PT Ketapang Agro Lestari has fulfilled its normative obligations to employees including; Enforcement of Sectoral Minimum Wages, Provision of Holiday Allowances on time, provision of housing facilities, clean water and electricity to employees, provision of work equipment and personal protective equipment, facilities for places of worship, sports for employees, school transportation for employees' students, etc. • Mandatory Employment Report has been submitted. • PT KAL already has a Company Regulation (PP/Peraturan Perusahaan) which has been approved by the Kutai Barat Regency on 10 December 2019. • The wages of employees at PT Ketapang Agro Lestari are following the Decree of the Governor of Kalimantan Timur. • The company does not yet have a Labor Union, but it already has a LKS (Lembaga Kerja Sama) Bipartit Cooperation Institution (LKS) which has been registered at the Disnakertrans Kutai Barat Regency. • There is no child labor. • The recruitment process has been carried out in accordance with the procedures and laws and regulations. • During the 2020-2021 Period, there are no records related to industrial relations issues. <p>Audit Team verification and response:</p>

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- Mandatory Employment Report No. Report: 0722022021 for 2021 period has been submitted to the Kalimantan Timur Province on 22 February 2021
 - Company Regulations (PP/Peraturan Perusahaan); The company currently has a Company Regulation (PP) for the period 2019-2021 which has been approved by the Manpower and Transmigration Office of Kutai Barat Regency according to Decree No. 568/2713/DTKT-BPTKHI/XII/2019 dated 10 December 2019 concerning "Enforcement of PT Ketapang Agro Lestari Company Regulations" valid from 20 December 2019 to 20 December 2021 and has been included in the book Registration for Legalization of Company Regulations for the Manpower and Transmigration Service Kutai Barat Regency cq. Manpower Protection and Industrial Relations Sector No. 25/PP-XII/2019.
 - PT. Ketapang Agro Lestari does not have a Labor Union, but a LKS (Lembaga Kerja Sama) Bipartit has been formed in accordance with the Decree of the Head of the Manpower and Transmigration Office of Kutai Barat Regency No. 568/2236/DTKT-BPTKHI/IX/2019 dated 27 September 2019 concerning "Registering the PT KAL LKS Bipartit", the management structure of the LKS Bipartite is valid for 3 (three) years or until 27 September 2022. The composition of the LKS Bipartit:
 - Chairman: Milky Way Nugroho
 - Secretary: Chandra Menrofa
 - Members:
 1. Satria Perdana Tarigan
 2. Deni Jailani
 3. Desto Hia
 4. Anton Ginting
 5. Iwan Flantino Nababan
 6. Risaldus
 - SOP Employee Recruitment SOP No. AD.PNK.HRD.R&S.002. 001 "Permanent Daily Employee Recruitment Procedure". The procedure is explained as follows:
 - If there is a need for manpower, the Plantation Assistant/Askep of the Plantation will fill out the PTK form which will be submitted to the Management of the Plantation, and the Manager of the Plantation will submit it to the Director of Plantation,
 - If you have obtained approval from the Plantation Director, a recruitment process will be carried out through an employment agency regarding the number of workers and types of work
 - Conducted socialization, selection, and check the completeness of labor administration,
 - The signing of the employment agreement, and then the company will arrange the departure time, ticket purchases, accommodation (consumption, lodging, transportation).
 - After the workers arrive at the site, the KTU will make a Minutes of Handover of Manpower and the handover of facilities provided by the company and known by the Garden Assistant/Askep of the Plantation.
- PT Ketapang Agro Lestari, has submitted a mandatory manpower report and has been verified based on the 2021 report period Report: 0722022021 on 22 February 2021. Verification has been carried out on the ratification of the Company Regulations (PP/Peraturan Perusahaan) owned by PT Ketapang Agro Lestari dated 10 December 2019.
- PT KAL has not yet formed a labor union, but has a Bipartite Cooperation Agency, based on the Decree of the Head of the Manpower and Transmigration Office of Kutai Barat Regency

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	<p>No. 568/2236/DTKT-BPTKHI/IX/2019 dated 27 September 2019 concerning "Registering the PT KAL LKS Bipartit".</p> <p>It has been verified to the Head of the Department of Manpower and Transmigration Kutai Barat Regency, that in the 2020-2021 period there are no records related to industrial relations problems.</p> <p>The company has maintained good management of occupational and social policy, all feedback from Dinas Tenaga Kerja Kabupaten Kutai Barat are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>
<p>Dinas Lingkungan Hidup Kabupaten Kutai Barat</p>	<p>Feedbacks:</p> <ul style="list-style-type: none"> • PT KAL has routinely reported the results of Environmental Monitoring and Management (RKL/UPL), based on data at the DLH Office last reported for the first semester of 2021. • Liquid waste originating from PKS is fully utilized for Land Applications through WWTP ponds. • Until the 2020-2021 period, there are no complaints or claims from the public or other institutions related to environmental pollution. <p>Issues:</p> <p>In 2019, there was an issue of complaints from the surrounding community related to river pollution caused by PT KAL Mill waste.</p> <p>Audit Team verification and response:</p> <p>Related to the issue of the application of administrative sanctions of government coercion to PT KAL which was determined based on the Decree of the Regent of Kutai Barat No. 666.1/K.572/2019 dated 8 April 2019.</p> <p>In order to fulfill the obligation of administrative sanctions imposed by the government, PT KAL through the letter of the Director of PT Ketapang Agro Lestari No. KAL/005/V-19/UM dated 16 May 2019 regarding the request for verification of the report on compliance with administrative sanctions obligations, the Head of the Environmental Service of the Kutai Barat Regency assigned a team to the field with an assignment order no. 090/67/DLH-PPKL/VI/2019 on 14 June 2019 which consists of:</p> <ol style="list-style-type: none"> a. Makkulau, S.Hut., M.A.P b. Mahaan, S.Hut c. Lukman Moul Hakim, S.Hut d. Sumber Arif Fahrudin, ST e. Adrianus Susanto, S. Hut <p>The verification team has taken water samples at the following points:</p> <ol style="list-style-type: none"> 1. Hulu Sungai Tuang 2. Hilir Sungai Tuang 3. Outlet <p>After checking the water sample on 18 June 2019 based on the Kalimantan Timur Province No. 02 of 2011 concerning water management, Water Quality and Water Pollution Control. Based on a check from the DLH, Kutai Barat Regency, it was not proven that there was river pollution by PT KAL which resulted in administrative sanctions by the government.</p> <p>Verification has been carried out based on interviews with Lendian Village officials, that there are no issues related to the environment. As for the issues in 2019, verification has been carried out by the District Environmental Office (DLH). Kutai Barat and from the verification results that there is no evidence of river pollution by PT KAL which has resulted in administrative sanctions by the government.</p>

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	<p>The company has maintained good management of occupational and social policy, all feedback from Dinas Lingkungan Hidup Kabupaten Kutai Barat are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>
<p>Badan Pertanahan Nasional Kabupaten Kutai Barat</p>	<p>Feedbacks:</p> <p>The company has carried out obligations related to the establishment of local community plantations under the Plasma scheme/Scheme smallholder. Although there is a shift in the allocation of the plasma location, it is not a problem with the record that the area of the location corresponds to the allocation of 20% of the HGU area. Regarding the change of plasma location in the HGU area, a statement from the parties can be made and mutually agreed upon</p> <p>Audit Team verification and response:</p> <p>Regarding the change of plasma location in the HGU area, it was carried out with the agreement of the parties jointly through the Joint Agreement on Plotting of Partnership Plantation / Plasma Cooperatives of Sempekak Penawang Lendian Sejahtera on 9 November 2020 concerning Determination of Plotting of Partnership/Plasma plantations which was signed by representatives of PT Ketapang Agro Lestari by Bpk. Ali Nafiah (GA Manager), Bpk. Nius Head of Serba Usaha Sempekak Penawang Lendian Sejahtera Cooperative, Bpk. Rudihartono (cooperative secretary) and Bpk. Pilot (Cooperative Treasurer). This agreement was also known by Edi Suriadinata (Petinggi Lendian) and Yunus (Penanwang official).</p> <p>This agreement contains, among others:</p> <ul style="list-style-type: none"> - Allocation of partnership gardens/plasma of the Sempekak Penawang Lendian Sejahtera Multipurpose Cooperative with reference to the land transfer agreement, which is to give 20% as partnership (Scheme smallholder) and 80% as core land calculated from the area cultivated (planting and infrastructure) - The plot of the partnership/plasma plantation which has been agreed upon by both parties is 1,246.24 Ha according to the map. - Plotting for the addition of the partnership/plasma garden will be carried out by the parties after the new plants enter the mature planting (TM/Tanaman Menghasilkan) where the location for the addition of the partnership/plasma garden will be attempted to be integrated and in one area with the partnership/plasma garden which has been agreed upon by the parties. <p>This issue has been verified with the Head of BPN Kutai Barat Regency (Bpk. Roshid) and Bpk. Nius (the head of the Cooperative) and Mr. Edi Suriadinata (Petinggi Desa Lendian), that the plotting of the partnership area refers to the agreement of the two parties, namely the Joint Agreement on Plotting of Plantation Partnership/Plasma Serba Usaha Sempekak Penawang Lendian Sejahtera Cooperative on 9 November 2020.</p> <p>As well as verification of the Collective Agreement on Plotting Plantation Partnership/Plasma Serba Usaha Sempekak Penawang Lendian Sejahtera Cooperative on 9 November 2020.</p> <p>The company has maintained good management of occupational and social policy, all feedback from Badan Pertanahan Nasional Kabupaten Kutai Barat are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>
<p>LKS-Lembaga Kerja Sama Bipartit</p>	<p>Feedbacks:</p> <p>PT. Ketapang Agro Lestari does not have a Labor Union, but a LKS (Lembaga Kerja Sama) Bipartit has been formed in accordance with the Decree of the Head of the Manpower and Transmigration Office of Kutai Barat Regency No. 568/2236/DTKT-BPTKHI/IX/2019 dated 27 September 2019 concerning "Registering the PT KAL LKS Bipartit", the management structure of the LKS Bipartite is valid for 3 (three) years or until 27 September 2022</p> <p>There are no issues related to employment in the period 2020-2021.</p>

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	<p>Audit Team verification and response:</p> <p>PT. Ketapang Agro Lestari does not have a Labor Union, but a LKS (Lembaga Kerja Sama) Bipartite has been formed in accordance with the Decree of the Head of the Manpower and Transmigration Office of Kutai Barat Regency No. 568/2236/DTKT-BPTKHI/IX/2019 dated 27 September 2019 concerning "Registering the PT KAL LKS Bipartit", the management structure of the LKS Bipartite is valid for 3 (three) years or until 27 September 2022. The composition of the LKS Bipartit:</p> <p>Chairman: Milky Way Nugroho Secretary: Chandra Menrofa Members:</p> <ul style="list-style-type: none"> - Satria Perdana Tarigan - Deni Jailani - Desto Hia - Anton Ginting - Iwan Flantino Nababan - Risaldus <p>The PT KAL LKS Bipartite activity on 18 December 2020 was attended by 23 people, with a meeting agenda related to the socialization of labor policies.</p> <p>According to the structure of the labor organization (LKS Bipartite) it was noted that the members of the organization consisted of 5 representatives of the Company's management and 3 representatives of workers/laborers. In accordance with the terms or conditions of the Manpower Office of West Kutai Regency it is stated that the Bipartite LKS must be 1:1 between management and workers.</p> <p>This is a non-compliance with RSPO P&C 6.3.3</p> <p>The company has maintained good management of occupational and social policy, all feedback from LKS-Lembaga Kerja Sama Bipartite are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>
<p>Head of Gender Committee</p>	<p>Feedbacks:</p> <p>The Gender Committee have already established on 1 October 2021 by the Estate Manager. Already has an organizational structure for the period 2021 – 2023, chaired by Ms. Marda Datu Bua, consisting of several coordinators, includes:</p> <ul style="list-style-type: none"> - Gender Equality Coordinator: Hernawati - Counselling Coordinator: Novalia Sari - Women's Rights Coordinator: Ayu Novita Sari - Training Coordinator: Seriyani. <p>There are no issues</p> <p>Audit Team verification and response:</p> <p>The gender committee at PT Ketapang Agro Lestari has been established and endorsed by the Plantation Manager chaired by Ms. Marda Datu Bua on 1 October 2021.</p> <p>Organizational structure, objectives of establishment and Duties Authority and responsibilities of the Gender Committee.</p> <p>The work program of the Gender Committee for the period 2021-2023 is as follows:</p> <ol style="list-style-type: none"> 1. Conduct of socialization and transfer of knowledge related to the laws and regulations governing gender equality

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	<ol style="list-style-type: none"> 2. Open a consultation and complaint room for women workers in particular 3. Following up on cases of sexual harassment and complaints of female/female workers 4. Conduct regular meetings with the company to discuss issues related to women workers and gender equality. <p>This gender committee has just been formed on 1 October 2021, so guidance and direction from the Plantation Manager are needed related to carrying out work programs that must be carried out.</p> <p>During the interview with the Chair of the Gender Committee, Mrs. Marda Datu Bua, that in general he knows the duties and responsibilities as well as the authority as chairman.</p> <p>The company has maintained good management of occupational and social policy, all feedback from Gender Committee are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>
<p>Head of Lendian Village / Petinggi Desa and Koperasi Serba Usaha Sempek Penawang Lendian Sejahtera</p>	<p>Feedbacks:</p> <p>Issues:</p> <p>Requesting that a CSR program be held for scholarships for school children and then later have the opportunity to work at PT KAL.</p> <p>Do not know the FFB price determination from the Plantation Regency in each period, after there is a report on the FFB harvest, the FFB price is known.</p> <p>Audit Team verification and response:</p> <p>The company will accommodate aspirations related to the CSR program for scholarships for school children to be considered for the CD-CSR program. The company has a Community Empowerment Program Identification, Management and Monitoring Procedure (SOP.CSM.EAC.001 dated 16 March 2015). The SOP aims to ensure that the stages and processes of the Community Empowerment program which include identification, management, and monitoring and evaluation run effectively and efficiently.</p> <p>For job opportunities, the company will continue to pay attention to local workers who are tailored to the needs of the company's work and operations</p> <p>Periodically will update FFB price information and communicated on facilities that can be accessed by farmers</p> <p>Verification has been carried out through the CD-CSR Program and Budget document for the 2021 period.</p> <p>Verification was also carried out on the Semester II 2020 and Semester I 2021 CSR Reports, the following are the activities that have been carried out by PT KAL which have been carried out in the 2020-2021 period.</p> <p>Based on the annual CSR report per semester, that the realization of the CD-CSR program for the 2020 period is 40.72% of the budget that has been set, while in the first semester of 2021; realization of achievement of 56.71% of the Budget. The failure to achieve this budget was caused by the Covid-19 outbreak and the implementation of social restrictions from the government, so that realization in 2020 was hampered and 100% of the budget was not achieved.</p> <p>The company has maintained good management of occupational and social policy, all feedback from Head of Lendian Village / Petinggi Desa and Serba Usaha Sempek Penawang Lendian Sejahtera Cooperative are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>
	<p>Feedbacks:</p>

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<p>Dewan Adat Dayak Kalimantan Timur (NGO)</p>	<ul style="list-style-type: none"> - The Dayak Customary Council of East Kalimantan has the main job of assisting the Dayak indigenous people if there are problems such as land disputes with companies, land grabbing and other social problems. - So far, there have been no cases of land disputes between the Dayak people and PT KAL. - PT KAL has so far paid attention to the environment and the surrounding community with the existence of a CSR program and the development of plasma plantations for the local community. - Dayak Customary Council of East Kalimantan hopes that all companies in East Kalimantan will pay attention to the Dayak indigenous people around the company and not marginalize the Dayak indigenous people. <p>Audit Team verification and response: PT KAL has a programme of CSR to enhance the local people livelihood. PT KAL also has develop the plantation for surrounding community in the form of Plasma with total area of 1,474.3261ha There is no land dispute with surrounding community and no grievance occur.</p>
<p>FFB Transporter Contractor</p>	<p>Feedbacks:</p> <ul style="list-style-type: none"> • PT KAL provides an opportunity to cooperate in the transportation of KAL's FFB plantations to local contractors • Determination of the FFB loading price is delivered transparently and explained in the SPK • Cooperation has been stated in the SPK and signed by both parties, and its implementation is in accordance with the SPK, such as payments. <p>No issues.</p> <p>Audit Team verification and response: PT KAL provides opportunities for local contractors to cooperate with oil palm plantation activities. Partnership cooperation with contractors is contained in a cooperation contract (SPK: Work Agreement). Until the 2021 period, there are no complaints from local contractors. The results of the interview have been verified with the company through the SPK No. document. 004/BSP/JKTO-II/XII/2019 – ATBS on 2 December 2019 and valid until 31 December 2024. The company has maintained good management of occupational and social policy, all feedback from Contractor are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Samiq	2010	2 Ha	Yes	Yes	Comply
Bpk. Nius	2010	1.9 Ha	Yes	Yes	Comply
Bpk. Yotam M.	2010	2.2 Ha	Yes	Yes	Comply
Bpk. Rintonati	2010	2 Ha	Yes	Yes	Comply

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Bpk. Samiq	2010	2 Ha	Yes	Yes	Comply
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Previous land owner / user comment



#1	<p>Feedbacks:</p> <ul style="list-style-type: none"> • The "Tali Asih" compensation process is carried out without coercion and voluntarily • Tali Asih compensation was witnessed directly by the Village Head and other witnesses (nearby area). There were no land conflicts during the land compensation process. • The amount of compensation is delivered transparently and with a fair value. • With the partnership, it gives hope to the community to be able to improve the economy. <p>Audit Team verification and response:</p> <p>PT Ketapang Agro Lestari already has a mechanism or information management system, namely Communication Procedure No. FR.EMS.CIE. Rev.01 dated February 24, 2020. This procedure also describes the methods to assist the flow of information. Forms of information include requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions and consultations with the company. Procedures are provided in Indonesian so they can be understood by stakeholders and communities around the plantation</p> <p>In period 2010 – 2017 that the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process, with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation.</p> <p>Letter of Agreement on Land As well as Planting and Building No. 09/kal/TA.Pnwg/I/2011 dated 23/01/2011 on behalf of Ngebe who resides in Penawang Village, Siluq Ngurai District, Kab. Kutai Barat, owner of KTP 6407171403580001 who legally owns a plot of land and all crops and buildings covering an area of 1,246.28 hectares located in Penawang village, Kec. Siluq Nurai, Kab. Kutai Barat. Furthermore, land acquisition for the development of oil palm plantations is a partnership program.</p> <p>The agreement letter is also accompanied by supporting documents including:</p> <ul style="list-style-type: none"> - Land Map and coordinates - Minutes of Inventory of land, planting and building no. 09/KAL/TA.Pwg/x/2010 dated 20 January 2011 - Declaration of Land Ownership/Ownership (SPPAT) No. 09/KAL/TA.Pwg/x/2010 dated 20 January 2011 - Declaration Letter of Land Transfer and Planting and Building dated March 10, 2011 - Letter of Approval of Family/Heirs No. 09/SPAW/Pnwg/K.Slq/I/2011 dated 27 January 2011 - Statement Letter Not Doing Lawsuit/Calls In Any Form No. 09/Nbe-Pnwg/K.Slq/I/2011 dated 27 January 2011 - Statement letter from land owner stating the transfer of land to PT Ketapang Agro Lestari dated 8 March 2011 for an area of 1,246.28 Ha. - Receipt of payment of Tali Asih land area of 1,246.28 Ha to Br. Ngebe dated 8 March 2011 - Photos of the payment of Tali Asih funds by PT Ketapang Agro Lestari to Br. Hanging out in Penawang Village, Kec. Siluq Nurai <p>Based on interviews with previous land owners, that there is no land conflict. The land compensation process is carried out in a transparent and fair manner.</p> <p>Regarding this land, verification will always be carried out through interviews with the surrounding village community and other relevant stakeholders.</p>
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3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that **PT Ketapang Agro Lestari – Ketapang Agro Lestari POM** has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 201 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that **PT Ketapang Agro Lestari – Ketapang Agro Lestari POM** is certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Nanang Rusmana	Name: Eko Darmawanto
Company Name: On behalf of BSI Services Malaysia Sdn. Bhd.	Company Name: PT Ketapang Agro Lestari – Ketapang Agro Lestari POM
Title: Lead Auditor	Title: Head of Sustainability
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>  Eko Darmawanto
Date: 23 March 2022	Date: 25 March 2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>The company already has a Communication Procedure No. 02 dated November 22, 2018 (FR.EMS.CIE). The procedure also explains related to information that can be accessed by stakeholders regarding legal, environmental, social and sustainable improvement issues that can be conveyed during meetings or communication with stakeholders as follows (this submission must be in the appropriate language and form namely: Indonesian), including:</p> <ul style="list-style-type: none"> ▪ Legal (location permit, IUP or HGU) as long as it does not conflict with applicable laws/regulations ▪ Environment: (environmental policies, environmental management documents owned, RKL RPL reports, environmental achievements, identification and evaluation of environmental aspects and impacts, permits for utilization of factory waste, permits for temporary storage of B3 waste). ▪ Social (documents social activities and relations with the community). ▪ Continuous improvement (reducing the use of certain chemicals, reducing and utilizing of waste, controlling environmental & social impacts). ▪ Certificate of land rights/use rights ▪ Occupational Health and Safety (K3) Plan 	<p>Complied</p>

		<ul style="list-style-type: none"> ▪ High Conservation Value (HCV) & High Carbon Stock (HCS) Documentation ▪ Emission prevention and reduction plans ▪ Communication Procedures (process of handling complaints and responses) ▪ Public summary of the certification audit report ▪ Human Rights Policy. 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>Based on documents review and interviews with PT KAL management, all information is provided in Indonesian, while procedures and policies are presented in 2 languages, namely English and Indonesian. Reports submitted to the relevant agencies are presented in Indonesian.</p> <p>Internal documents such as employment contracts, reports to the relevant agency services are presented in Indonesian.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	<p>All requests for information regarding requests for access to information need approval from the Head of Sustainability, Head of General Affairs, and/Head of Legal. The company can refuse the request if the purpose of the request for the document is not clear.</p> <p>The provision of various information to related agencies is recorded in the "Buku Permintaan Informasi".</p> <p>In addition to providing information at the request of the relevant agencies, the provision of information is also routinely carried out to certain agencies in the form of routine reports. The routine report is a mandatory report required by applicable legal regulations, including:</p> <ul style="list-style-type: none"> ▪ The RKL-RPL report for the Semester I of 2021 PT Ketapang Agro Lestari, has been submitted to the Environmental Office of Kutai Barat Regency on 14 September 2021. Submission of the RKL-RPL report to the Environmental Office of Kalimantan Timur Province on 9 July 2021. 	Complied

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		<ul style="list-style-type: none"> ▪ Land Application Report for the Triwulan II of 2021, PT Ketapang Agro Lestari, has been submitted to the Environmental Office of Kutai Barat Regency on 14 September 2021. Submission of a report to the Environmental Office of Kalimantan Timur Province on 9 July 2021. ▪ LB3 Waste Report for the Triwulan II of 2021, has been submitted to the Environmental Office of Kutai Barat Regency on 14 September 2021. Submission of a report to the Environmental Office of Kalimantan Timur Province on 9 July 2021. ▪ The update report on the SK Endorsement & Management Structure of P2K3 2021 PT Ketapang Agro Lestari has been submitted to the Labor Office of Kalimantan Timur Province on 9 September 2021 ▪ Mandatory Employment Report No. Report: 0722022021 for the period 2021 has been submitted to the Labor Office of Kalimantan Timur Province on 22 February 2021. <p>In addition to responses to the requests for information that are routine in nature, there are also responses to requests for information from stakeholders that are not routine in nature and are recorded in the logbook of external incoming and outgoing letters, for example:</p> <ul style="list-style-type: none"> ▪ A request for information from the Head of Kampung Adat Penawang (Indigenous Institution) on 10 December 2020 regarding customary issues, was responded to on 15 January 2021, that the company has ensured that employees affected by customs to pay the sanctions as determined by the higher-ups. ▪ Requests for information from Lendian Village officials on 21 March 2021 regarding road openings, have been responded to on 21 April 2021 by sending a company survey team to survey the condition of the roads to be opened. ▪ The request for information from the Village Consultative Body (BPK) on 10 April 2021 regarding the request for village road repair, 	
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		<p>was responded on 8 June 2021 by providing financial assistance for the repair of village roads.</p>	
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>The company already has a Communication Procedure No. 02 dated 22 November 2018 (FR.EMS.CIE). The procedure also explains related to information that can be accessed by stakeholders regarding legal, environmental, social and sustainable improvement issues that can be conveyed during meetings or communication with stakeholders as follows (this submission must be in the appropriate language and form namely: Indonesian), including:</p> <ul style="list-style-type: none"> ▪ Legal (location permit, IUP or HGU) as long as it does not conflict with applicable laws/regulations ▪ Environment: (environmental policies, environmental management documents owned, RKL RPL reports, environmental achievements, identification and evaluation of environmental aspects and impacts, permits for utilization of factory waste, permits for temporary storage of B3 waste). ▪ Social (documents social activities and relations with the community). ▪ Continuous improvement (reducing the use of certain chemicals, reducing and utilizing of waste, controlling environmental & social impacts). ▪ Certificate of land rights/use rights ▪ Occupational Health and Safety (K3) Plan ▪ High Conservation Value (HCV) & High Carbon Stock (HCS) Documentation ▪ Emission prevention and reduction plans ▪ Communication Procedures (process of handling complaints and responses) 	<p>Complied</p>

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		<ul style="list-style-type: none"> ▪ Public Summary of the certification audit report ▪ Human Rights Policy. <p>This procedure has been socialized to all stakeholders, based on “Berita Acara Stakeholder Meeting dan Sosialisasi RSPO” to the community and to plasma farmers on 4 October 2021, the material and event weight and attendance list can be shown at the time of the audit.</p>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>PT Ketapang Agro Lestari has identified stakeholders around the plantation, recorded in the Stakeholder List update as of 1 September 2021, the list consists related to PIC name’s, relation, address and phone number, including:</p> <ol style="list-style-type: none"> 1. Provincial and Regency Level Services/Agencies: <ul style="list-style-type: none"> ▪ Environmental Agency of Kalimantan Timur Province and Kutai Barat Regency ▪ Regional Investment Coordinating Board (BKPM) of Kalimantan Timur Province and Kutai Barat Regency. ▪ National Land Agency (BPN) Kalimantan Timur Province and Kutai Barat Regency ▪ Department of Manpower Kalimantan Timur Province and Kutai Barat Regency ▪ Department of Plantation, Livestock and Fisheries of Kutai Barat Regency. ▪ Directorate General of Taxes KPP Tenggarong 2. Siluq Ngurai District Government 3. Police: Siuq Ngurai Police 4. Village Government: <ul style="list-style-type: none"> ▪ Village Government / Officials of Lendian Village and Penawang Village 	Complied

		<ul style="list-style-type: none"> ▪ Dayak Customary Council <p>5. Health Service:</p> <ul style="list-style-type: none"> ▪ Barong Tongkok District Health Center (Puskesmas) ▪ Siluq Ngurai District Health Center (Puskesmas) <p>6. Community leaders and communities around the plantation, including the previous land owner</p> <p>7. Contractors and Suppliers</p> <p>8. Companies around the Plantation: PT Rodamas Timber, PT Kelawit Hutan Lestari and PT Timber Dana</p> <p>9. NGO's: LSM FAKTA (Forum Akutabilitas dan Transparansi Kutai Barat)</p>	
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>PT Ketapang Agro Lestari already has policies and declared policies related to business ethics, consisting of:</p> <ol style="list-style-type: none"> 1. Zero Fraud Tolerance Policy; document no. FR.CIA.ZFT.001 published on December 28, 2012; explain related to the general understanding within the company environment related to the incidence of fraud with the aim of: <ul style="list-style-type: none"> ▪ Communicate clearly that the company does not tolerate fraud and will provide strict sanctions for fraud perpetrators. ▪ Achieve a consistent approach in managing incidents of fraud. ▪ Define the main components of the fraud risk management framework that is generally applicable in the company <p>The Zero Fraud Risk Tolerance program at First Resources Group is a Fraud Prevention program including the Human Resources management process, proper employee recruitment and delegation of authority.</p>	Complied

		<p>2. Policies & Procedures regarding the Prohibition of Accepting Bribes, Rewards, Gifts & Other Gratuities, document No. FR.CSOP.LPSIHG.015 dated December 9, 2019. Explains the reference for all First Resources Group (FR Group) employees in following up on the prohibition of accepting bribes, rewards, gifts and other gratuities by business partners/third parties to realize company management with integrity in accordance with the Company's Policy on the First Resources Group Code of Conduct. This policy applies throughout the FR Group for transactions and interactions with business partners/third parties.</p> <p>This policy has been socialized to all employees of PT Ketapang Agro Lestari on 23-24 January 2020 and on 08 December 2020</p> <p>This policy has also been conveyed to all third parties (Contractors) who cooperate with PT Ketapang Agro Lestari through direct meetings when signing the cooperation contract. Furthermore, the Contractor also makes a statement through the Company's Commitment Letter-Surat Komitmen Perusahaan, which contains related commitments: the use of PPE, the prohibition of disposing of B3 waste, labor protection (including the prohibition on the use of child labor and underage) and compliance with law and human rights including the application of ethical behaviour.</p> <p>Example of contract:</p> <ul style="list-style-type: none"> - CPO Transport Agreement Letter No. KAL/078/SPJP/XII-20/DIR dated December 31, 2020 on behalf of PT Jaya Harapan Nusa Sejahtera (namely Johan Arifin); PT Jaya Harapan Nusa Sejahtera's Letter of Commitment dated April 11, 2021. - Kernel Transportation aAgreement Letter-Surat Perjanjian Pengangkutan Palm Kernel No. KAL/016/SPJP/I-21/DIR dated 4 January 2021 on behalf of CV Inti Jaya (namely: Riki Anggara); CV Inti Jaya's Letter of Commitment dated 7 April 2021. 	
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		<ul style="list-style-type: none"> - Palm Oil FFB Sale and Purchase Agreement No. MCA/001/JBTS/I/2021 dated January 4, 2021, on behalf of PT Marsam Citra Adi Perkasa, has stated a commitment related to the code of business ethics "Letter of Commitment to PT Marsam Citra Adiperkasa" on May 1, 2021. - Palm Oil FFB Sale and Purchase Agreement No. BSMJ/010/JBTS/I/2021 dated January 4, 2021, on behalf of PT Borneosurya Mining Jaya, has stated a commitment related to the code of business ethics "Letter of Commitment to PT Marsam Citra Adiperkasa" on April 1, 2021. <p>Based on interviews with Kepala Tata Usaha (KTU)/Head of Administration and several employees of PT KAL (Est****, Yoh*** Mil**, M. Za*** etc.) on 12-16 October 2021, that in the recruitment process there are no practices that violates the company and business code of ethics, for example: collecting money during the recruitment process, job fraud, wages and others.</p>	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	PT KAL has carried out internal monitoring and supervision related to the implementation of company procedures and policies through the Monitoring and Evaluation of SOP Procedures and Policies for the administrative aspects of plantations and mills which were carried out on March 25 – April 16, 2019 and for implementation of production procedures ware carried out on 27 May – 8 June 2021.	Complied
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	(C) The unit of certification complies to relevant regulations.	<p>The company has demonstrated evidence of compliance with relevant legal requirements, such as:</p> <ol style="list-style-type: none"> 1. Location Permit-Izin Lokasi issued by the Regent of Kutai Barat in accordance with the Decree of the Regent of Kutai Barat No: 	Complied

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		<p>525.26/K.867/2009 dated October 28, 2009 regarding the Location Permit for Oil Palm Plantation of PT Ketapang Agro Lestari. This location permit has a validity period until October 27, 2012.</p> <p>In 2011, the Regent of Kutai Barat issued a Decree of Kutai Barat Number: 525.29/K.1013/2011 dated November 25, 2011 regarding Revisions to the Decree of the Regent of Kutai Barat No: 525.26/K.867/2009 concerning Permits for Palm Oil Plantation Business Locations of PT. Ketapang Agro Lestari</p> <p>In 2012 an extension was made. The Government of Kutai Barat Regency has re-issued the Decree of the Regent of Kutai Barat No: 525.26/K.1181/2012 dated December 31, 2012 regarding the Amendment to the Decree of the Regent of Kutai Barat No: 525.26/K.867/2009 concerning the Location Permit for the Palm Oil Plantation of PT Ketapang Agro Lestari .</p> <p>PT KAL submitted an application for Change of Area Permit for Palm Oil Plantation Location on behalf of PT Ketapang Agro Lestari No. 127/KAL-JKT/VIII/2012 dated 27 August 2012. This is based on the Peace Agreement dated 15 May 2012 between PT Perkebunan Sentawar Pembangunan (PT PSM) and PT Ketapang Agro Lestari (PT KAL) and the Peace Agreement on 3 July 2012 between PT PSM and PT KAL.</p> <p>Thus, based on the above documents, it can be stated that the company already has a Location Permit, the latest dated December 31, 2012 on a land area of ± 9,271 Ha. The permit is valid for 3 years until December 30, 2015.</p> <p>2. Plantation Business License: Izin Usaha Perkebunan-IUP based on the Decree Kutai Barat Regency Number: 525.26/K.941 a/2010 dated November 22, 2010 concerning the Granting of an Oil Palm Plantation Business Permit for PT Ketapang Agro Sejahtera.</p>	
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		<p>According to the Article 32 Paragraph (1) Government Regulation no. 24 of 2018 concerning the Electronically Integrated Business Licensing Services c.q OSS (Online Single Submission) Lembaga Pengelola dan Penyelenggaraan - Management and Administration Agency, has been issued:</p> <ul style="list-style-type: none"> ▪ NIB No: 8120018132194 ▪ Published on 29 November 2018 ▪ 5th Revision on 23 February 2021 ▪ Code of KBLI 10431: Industri Minyak Mentah Kelapa Sawit (Crude Palm Oil) ▪ Code of KBLI 101262: Perkebunan Buah Kelapa Sawit ▪ Code of KBLI 10432: Industri Minyak Mentah Inti Kelapa Sawit (Crude Palm Kernel Oil) <p>Previously, an assessment has been carried out and has received a technical recommendation from the Plantation Service of the East Kalimantan Provincial Government, based on Letter No. 525/4117/BU dated July 1, 2016 concerning Technical Recommendations, as follows:</p> <ul style="list-style-type: none"> ▪ Types of Plantation Business: Integrated Palm Oil Plantation with Processing Units into Palm Oil (CPO) and Palm Kernel ▪ Location: Kutai Barat Regency, East Kalimantan Province ▪ Commodity: Palm Oil ▪ Area : 9,271 Ha ▪ Factory Capacity: 45 Ton FFB/hour which can be increased up to 90 Ton FFB/hour. <p>3. Decree of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number: 92/HGU/KEM-ATR/BPN/X/2019 dated October 18, 2019 concerning the Granting</p>	
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		<p>of HGU on behalf of PT Ketapang Agro Lestari on land in Kutai Barat Regency, East Kalimantan Province. From this decision, HGU certificates were issued, including:</p> <p>A. Inti Plantation:</p> <ul style="list-style-type: none"> ▪ HGU Certificate No. 00225 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 1,425.08 Ha (NIB 16.11.00.00.00221) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. ▪ HGU Certificate No. 00226 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 3,230.5352 Ha (NIB 16.11.00.00.00222) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. ▪ HGU Certificate No. 00227 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 905.8800 Ha (NIB 16.11.00.00.00223) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. ▪ HGU Certificate No. 00228 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 93.2413 Ha (NIB 16.11.00.00.00224) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. <p>Total: 5.865,7052 Ha</p> <p>B. Scheme Smallholder:</p> <ul style="list-style-type: none"> ▪ HGU Certificate No. 00229 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 738.8900 Ha (NIB 16.11.00.00.00470) located 	
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		<p>in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054.</p> <ul style="list-style-type: none"> ▪ HGU Certificate No. 00230 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 311.2348 Ha (NIB 16.11.00.00.00478) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. ▪ HGU Certificate No. 00231 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 330.9600 Ha (NIB 16.11.00.00.00479) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. ▪ HGU Certificate No. 00232 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 153.3700 Ha (NIB 16.11.00.00.00480) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. ▪ HGU Certificate No. 00233 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 148.8400 Ha (NIB 16.11.00.00.00482) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. <p>Total 1,474.3261 Ha</p> <p>However, in the current RSPO certification, what is included in the scope of the RSPO Certification is the Inti Plantation with an area of 5,865.7052 Ha.</p> <p>4. Documents of the Company's Deed of Incorporation:</p> <ul style="list-style-type: none"> ▪ Deed of establishment of the Company: No. 41 dated 22/6/2006 	
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		<ul style="list-style-type: none"> ▪ Letter of Ratification - SK Pengesahan Menhukam: no. C-21343 HT.01.01.TH.2016 dated 20/07/2016 ▪ Deed of Change of Management (Directors & Commissioners): no. 23 on 29/01/2018 ▪ SK Notification of Change of Management: no. AHU-AH.01.03-0057619 dated 02/06/2018 <p>5. Permit Documents (Domicile, TDP, SIUP):</p> <ul style="list-style-type: none"> ▪ Certificate of Bussines - Surat Keterangan Domisili Usaha dated 7 May 2018 due on 30 June 2023 ▪ Trade Registration Certificate - Surat Tanda Daftar Perdagangan (TDP) dated 7 May 2018, due on 30 June 2023 ▪ Trading Bussines Permit - Surat Izin Usaha Perdagangan (SIUP) dated 6 Desember 2017 ▪ Number of Tax - NPWP No. 02.5220.566.7-725.000 <p>6. Environmental Permit - Izin Lingkungan:</p> <ul style="list-style-type: none"> ▪ AMDAL No. 660.5/007/AMDAL/BLH-KBR/VI/2010 dated 22 June 2010 ▪ AMDAL UKL-UPL no. 660/005/UKL-UPL/IV/2017 dated 28 April 2021 ▪ Environmental Permit - Izin Lingkungan KCP dan Refinery No. 660/85/DPMPPTSP-TU/IX/2018 dated 16 September 2021 ▪ Waste Utilitation Permit - Izin Pemanfaatan Air Limbah No. 666.3/1361/DPMPPTSP-TU/XII/2018 dated 11 December 2018 dan masa berlaku sampai dengan 11 Desember 2021 ▪ Hazardous Waste Temporary Storage Permit - Izin TPS LB3 No. 668.4/783/DPMPPTSP-TU/VII/2018 Dated 16 July 2018, valid until 16 July 2023 <p>7. Permits and Other Documents:</p>	
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		<ul style="list-style-type: none"> ▪ Building Permit - Izin Mendirikan Bangunan (IMB) No. 645.9/103/059/BP2T-PU/IV/2016 dated 18 April 2016 ▪ Determination of Plantation Class for Operational Stage B based on the results of Plantation Business Assessment No. 525.29/K.1108/2019 on November 5, 2019 <p>8. OSS Integrated Permissions/Documents:</p> <ul style="list-style-type: none"> ▪ Business License Number - Nomor Izin Berusaha (NIB) No. 81200181132194 dated 26 January 2019 ▪ Business License - Izin Usaha No. 81200181132194 dated 26 January 2019 ▪ Komitmen Prasarana Usaha No. 81200181132194 dated 29 November 2019 ▪ Commercial/Operational Permit - Izin Komersial / Operasional No. 81200181132194 dated 29 November 2019 ▪ Commercial License - Izin Komersial No. 81200181132194 dated 29 November 2019 ▪ Location Permit - Izin Lokasi No. 81200181132194 dated 26 January 2019 ▪ Environmental Permit - Izin Lingkungan No. 81200181132194 dated 29 November 2019 <p>Based on the verification of licensing/legal documents, that the legality documents belonging to PT Ketapang Agro Lestari are still valid in accordance with the laws and regulations</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p>	<p>PT KAL already has mechanisms related to compliance with legal compliance and evaluation of compliance:</p> <ol style="list-style-type: none"> 1) Legal Requirement Procedure, No. FR.EMS.LBR dated September 1, 2011; describes the mechanism for identifying and gaining access to voluntary regulations and guidelines that apply to all 	Complied

		<p>aspects of the company's activities, production and services, this procedure also describes how to identify regulatory access and voluntary monitoring of regulations related to sustainable palm oil management.</p> <p>Sources of information that can be used to identify related regulations and requirements include:</p> <ul style="list-style-type: none"> ▪ National department website ▪ Publication of legislation at the national, provincial or regional level ▪ Internet discussion groups ▪ Seminars and meetings ▪ State secretary ▪ Ministry Office ▪ Local Government ▪ Other related agencies (such as BAPEDAL, etc.) <p>PT KAL also has an Evaluation of Compliance procedure, No. FR.EMS.ECR dated September 1, 2011; explains the mechanism for evaluating compliance with relevant laws and regulations with environmental aspects of EMS and implementation of sustainable palm oil management.</p> <p>The Corporate Sustainable Head reviews all sources of regulations and other requirements and interprets them for implementation in operations and products.</p>	
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<p>2.1.3</p>	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p>	<p>The company has compiled a Work Instruction (IK) with the code: IK.PPH.01 regarding Maintenance of HGU Stakes/pegs dated December 6, 2018 as a guide in the activities of maintaining HGU stakes. The work instructions explain the HGU benchmark standards in accordance with the Minister of Agrarian Affairs/BPN No. 3 of 1997. Monitoring and maintenance of HGU boundary markings is carried out by each estate and is carried out once a year, where the monitoring results are compiled in the form of a monitoring report on the maintenance of stakes.</p> <p>Based on the Work Instruction Code: IK.PPH.01, that monitoring and maintenance of HGU stakes is carried out once a year, the last monitoring and maintenance was carried out in September 2021 by reinstalling 8 stakes.</p> <p>The number of HGU stakes contained in the HGU certificate is as many as 120 stakes which are still in the form of cadastral measurement stakes made of wood, PT KAL has made improvements by replacing the wooden stakes into cement stakes. As of October 2021, only 8 stakes have been realized from cement, so there are still 112 HGU stakes that are still in the HGU stake replacement program. However, PT KAL has mapped and identified all HGU stakes with coordinates.</p> <p>In this certification audit, field observations were made to see the presence of HGU stakes and their condition, several stakes were observed including:</p> <ul style="list-style-type: none"> - Peg HGU No. 047, location in block E.83 planting year 2019 coordinates: 0° 56' 52.0" S; 115° 54' 11.52" E - Peg HGU No. 048, location in block E.84 planting year 2019 coordinates: 0° 57' 2.67" S; 115° 54' 1.36" E - Peg HGU No. 049, location in block E.85 planting year 2019 coordinates: 0° 57' 12.09" S; 115° 53' 52.27" E 	<p>Complied</p>
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		<p>- Peg HGU No. 050, location in block D.86 planting year 2019 coordinates: 0° 57' 25.89" S; 115° 53' 39.04" E</p> <p>Based on field observations, the condition of the HGU stakes is well maintained and in accordance with the map contained in the HGU certificate. In the cadastral measurement in the HGU certification process, the HGU area is still using wooden stakes, then PT KAL has prepared plans and programs a Program/Plan for Reinstallation of HGU Stakes as follows:</p> <table border="1" data-bbox="1133 635 1966 775"> <thead> <tr> <th>Year</th> <th>Number of Stakes</th> <th>Stakes number to be installed</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>57</td> <td>01-29, 102-103, 105-129 dan 137-139</td> </tr> <tr> <td>2023</td> <td>55</td> <td>40-46, 51-97, 130-135 dan 140-141</td> </tr> </tbody> </table>	Year	Number of Stakes	Stakes number to be installed	2022	57	01-29, 102-103, 105-129 dan 137-139	2023	55	40-46, 51-97, 130-135 dan 140-141	
Year	Number of Stakes	Stakes number to be installed										
2022	57	01-29, 102-103, 105-129 dan 137-139										
2023	55	40-46, 51-97, 130-135 dan 140-141										
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.												
2.2.1	A list of contracted parties is available.	<p>PT KAL has a list of contracts and is well preserved in the format "Monitoring Kontraktor PT KAL tahun 2021", there are 2 contractors at PT KAL, monitoring is carried out for job type, job period, job progress as well as the status of BAP/payment of contracts, namely:</p> <ol style="list-style-type: none"> 1. PT Jaya Harapan Nusa Sejahtera, CPO Transporter, dated 11 April 2021, period of contract Y2021/2022 2. CV Inti Jaya, PK Transporter, dated 7 April 2021, period of contract Y2021/2022 <p>Based on interview with the General Manager and Head Clerk obtained information that the list of third parties updated in quarterly basis.</p>	Complied									
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.	<p>PT KAL has a list of contracts and is well preserved in the format "Monitoring Kontraktor PT KAL tahun 2021", there are 2 contractors at PT KAL, monitoring is carried out for job type, job period, job progress as well as the status of BAP/payment of contracts, namely:</p>	Complied									

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		<ol style="list-style-type: none"> 1. PT Jaya Harapan Nusa Sejahtera, CPO Transporter, dated 11 April 2021, period of contract Y2021/2022 2. CV Inti Jaya, PK Transporter, dated 7 April 2021, period of contract Y2021/2022 <p>The contract explains the legal requirements, as stated at the appendix 1 of contract, Point 4; Other sectors: fleet owners are obliged: not to use child labor (<18 years), do not discriminate, provide opportunities and treatment at work and do not commit acts of violence and harassment of fellow workers ".</p> <p>Point 5; Obligations: the fleet owner is obliged to obey the regulations and complete the vehicle documents, must wear personal protective equipment when working in the field or when sending FFB to PMKS.</p> <p>Point 6; Ban: fleet owners are prohibited from committing fraud, theft and embezzlement of FFB, are prohibited from sexually harassing coworkers and are prohibited from attacking, abusing funds or intimidating coworkers.</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>PT KAL has a list of contracts and is well preserved in the format "Monitoring Kontraktor PT KAL tahun 2021", there are 2 contractors at PT KAL, monitoring is carried out for job type, job period, job progress as well as the status of BAP/payment of contracts.</p> <p>For example:</p> <ol style="list-style-type: none"> 1. PT Jaya Harapan Nusa Sejahtera, CPO Transporter, dated 11 April 2021, period of contract Y2021/2022 2. CV Inti Jaya, PK Transporter, dated 7 April 2021, period of contract Y2021/2022 <p>The contract explains the legal requirements, as stated at the appendix 1 of contract, Point 4; Other sectors: fleet owners are obliged: not to use child labor (<18 years), do not discriminate, provide opportunities</p>	Complied

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		<p>and treatment at work and do not commit acts of violence and harassment of fellow workers ".</p> <p>Point 5; Obligations: the fleet owner is obliged to obey the regulations and complete the vehicle documents, must wear personal protective equipment when working in the field or when sending FFB to PMKS.</p> <p>Point 6; Ban: fleet owners are prohibited from committing fraud, theft and embezzlement of FFB, are prohibited from sexually harassing coworkers and are prohibited from attacking, abusing funds or intimidating coworkers.</p> <p>Based on public consultation with Labour Agency of Kutai Barat Regency obtained information that until this audit conducted, there was no complain or grievance record against workers issues or violation of human rights.</p>	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	<p>The company has conducted verification regarding the geolocation coordinate as per Traceability Procedure - SOP FR.CSOP.MRP.016 dated 9 December 2019 "Mekanisme Rantai Pasok" in point 3.3 has stated "<i>Ketelusuran Perkebunan untuk TBS, PK and CPO</i>". SOP has stated regarding the traceability information needed for FFB Suppliers for direct and indirect sources. For example: Supplier Verification Report for PT Marsam Citra Adiperkasa and PT Ketapang Hijau Lestari, geolocation verification has been carried out using the Google Maps and SAS Planet Applications.</p> <p>Information of geolocation of each FFB supplier can be demonstrated by the unit of certification.</p> <p>During the audit, auditor has checked the proof of ownership status of the all directly sourced FFB. There are 3 parties as the directly sourced of FFB for PT KAL, the following is the information that has been obtained:</p>	Complied

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		Geo-location of FFB supplier (directly sourced):	
No	FFB Supplier	Address	Coordinates (Latitude/Longitude)
1	PT Borneo Surya Mining Jaya (Subsidiary of First Resources)	Kecamatan Jempang, Kutai Barat, Kalimantan Timur	0° 37' 13.52" S / 116° 02' 20.40" E
2	PT Marsam Citra Adiperkasa	Kecamatan Long Iram dan Tering, Kutai Barat, Kalimantan Timur	0° 00' 48.07" S / 115° 39' 47.90" E
3	PT. Ketapang Hijau Lestari	Kecamatan Manaart Bulatan dan Muara Pahu, Kutai Barat, Kalimantan Timur	0° 13' 36.25" S / 115° 59' 24.80" E

PT KAL – KAL POM has been received the FFB from PT Marsam Citra Adiperkasa, PT Ketapang Hijau Lestari and PT Borneo Surya Mining Jaya as directly sourced FFB, the proof of ownership status has been shown during audit. For example:

- PT Marsam Citra Adiperkasa has had Izin Usaha Perkebunan Kelapa Sawit Based on SK Bupati Kutai Barat and Land Use Title (HGU).
- PT. Ketapang Hijau Lestari has had Izin Usaha Perkebunan Kelapa Sawit Based on SK Bupati Kutai Barat and Land Use Title (HGU).
- PT Borneo Surya Mining Jaya (subsidiary of first resources) has had Izin Usaha Perkebunan Kelapa Sawit Based on SK Bupati Kutai Barat and Land Use Title (HGU).

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		For indirectly sourced of FFB was identified, namely PT Wong Akeh Utama and CV Samurai.	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	Based on document review and interview with the management, it was known that the unit of certification has obtained the FFB from the collection centres namely PT Wong Akeh Utama and CV Samurai. The business permit from 2 suppliers as indirectly source of FFB was available during audit. The business permit for PT Wong Akeh Utama, "Izin Usaha/Surat Izin Usaha Perdagangan (SIUP)" is No. 8120104800993 dated 10 February 2020 from Lembaga OSS (Online Single Submission) and the business permit for CV Samurai, "Surat Izin Usaha Perdagangan (SIUP)" is No. 510.41/0595/BP2T dated 28 September 2016 from Pemerintah Kabupaten Kutai Kartanegara. The Integrity Pact/Statement Letter from PT Wong Akeh Utama on 18 May 2021 and CV Samurai on 30 April 2019 which states that FFB does not come from forest areas and not FFB from illegal suppliers are available. Currently the company is in progress of inventory for geo location verification and land ownership certificate. Since PT Ketapang Agro Lestari in progress of certification, for indirect source of FFB the time requirement to fulfil this criterion is 3 (three) years from initial point of certification (Annex 4: implementations procedure for indicator 2.3.2)	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			
3.1.1	(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.	PT KAL shows the business management plan, namely "Proyeksi PT Ketapang Agro Lestari Tahun 2020-2024". The business plan includes the projection of FFB production in total, costs, sales and revenues. Crop production projection/FFB yield trends over 4 years, mill extraction rates trends, cost of production. The FFB production takes into consideration the actual FFB production from 2014-2019. The business plan also	Complied

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		<p>taking into consideration the price forecast and financial indicators (such as inflation and currency exchange).</p> <p>PT KAL demonstrates financial report for fiscal year ends 31 December 2020. The financial report prepared by independent auditor, Ratnawati Setiadi, Register of Public Accountant No. AP.0698 on 28 June 2021 report No. 01646/2.1032/AU.1/01/0698-2/1/VI/2021 dated 28 June 2021. The auditor, in opinion mentioned that the financial report is good and comply with the Indonesian Financial Accountant Standard.</p> <p>Projection of Production for period 2020-2024:</p> <table border="1" data-bbox="1131 678 1977 1204"> <thead> <tr> <th>Item</th> <th>Unit</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Production</td> <td>Ton</td> <td>64.00</td> <td>71.04</td> <td>81.70</td> <td>90.68</td> <td>100.66</td> </tr> <tr> <td>Rawat TBM</td> <td>Ha</td> <td>1.03</td> <td>840</td> <td>81</td> <td>-</td> <td>-</td> </tr> <tr> <td>Rawat TM</td> <td>Ha</td> <td>5.23</td> <td>5.406</td> <td>6.166</td> <td>6.247</td> <td>6.247</td> </tr> <tr> <td>FFB Production</td> <td>Ton</td> <td>64,000</td> <td>71,040</td> <td>81,696</td> <td>90,683</td> <td>100,658</td> </tr> <tr> <td>FFB Processed</td> <td>Ton</td> <td>175.00</td> <td>110.44</td> <td>124.79</td> <td>141.01</td> <td>159.35</td> </tr> <tr> <td>CPO</td> <td>Ton</td> <td>45.50</td> <td>28.71</td> <td>32.45</td> <td>36.66</td> <td>41.43</td> </tr> <tr> <td>PK</td> <td>Ton</td> <td>7.86</td> <td>4.956</td> <td>5.60</td> <td>6.33</td> <td>7.16</td> </tr> <tr> <td>OER</td> <td>%</td> <td>26</td> <td>26</td> <td>26</td> <td>26</td> <td>26</td> </tr> <tr> <td>KER</td> <td>%</td> <td>4.49</td> <td>4.49</td> <td>4.49</td> <td>4.49</td> <td>4.49</td> </tr> </tbody> </table> <p>The projection also reveals the processing costs for 2020 - 2024. The projection costs consist of direct costs (cost at each station) and indirect cost (salary, benefit, permit and licenses, insurance, security, human capital development).</p>	Item	Unit	2020	2021	2022	2023	2024	Production	Ton	64.00	71.04	81.70	90.68	100.66	Rawat TBM	Ha	1.03	840	81	-	-	Rawat TM	Ha	5.23	5.406	6.166	6.247	6.247	FFB Production	Ton	64,000	71,040	81,696	90,683	100,658	FFB Processed	Ton	175.00	110.44	124.79	141.01	159.35	CPO	Ton	45.50	28.71	32.45	36.66	41.43	PK	Ton	7.86	4.956	5.60	6.33	7.16	OER	%	26	26	26	26	26	KER	%	4.49	4.49	4.49	4.49	4.49	
Item	Unit	2020	2021	2022	2023	2024																																																																			
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		<p>In addition, the company also shows evidence of its financial ability in paying taxes. One of them, proof of payment of surface water tax has been shown to the "Unit Pengelolaan Pendapatan Kutai Barat Regency". Payment receipt available by 14 June 2021.</p> <p>Until this audit finished, there is no agreement between the certificate holder with any smallholder surrounding the plantation area. Further information provided in criterion 5.2</p>	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	Based on document review, it was known that the older Oil Palm Planted in 2010, so the replanting program will be held on around 2035.	Complied
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	<p>Management review Ketapang Agro Lestari has conducted 3 August 2021, attended by Group Manager, Mill Manager, Head Assistant, Field Assistant, KTU and Sustainability Assistant. The management review has discussed:</p> <ul style="list-style-type: none"> - Result of RSPO Internal Audit for Estate and Mill that conducted on 23-25 June 2021; e.g. Governor regulation that has not been evaluated and regarding of hazardous waste handling. - Customer feedback: There is no complaint from customer for period Y 2020-2021. External complaint has been resolved by management in accordance of SOP Communication. - Preventive & Corrective Action: conducted evaluation to all regulation; to file all letter from pubic relation; give awareness to Safety Officer to document all risk analysis file, to maintenance of the road transport. 	Complied
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.	PT KAL (mill and estate) has action plan for continuous improvement Y2021 as follows:	Complied

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		<ul style="list-style-type: none"> Initiative Water Management: re-use condensate water and kernel silo heater water; recycle turbine cooler water; recycle lab extraction cooler water. Initiative Backhoe Loader: create ramp of boiler ash and standby trailer/Bin; install shell transport fan to shell file. Initiative reduce dirt: consistent using grading table; install FFB washing; automation of drain sand trap tank. Decrease the use of diesel fuel in heavy equipment during empty fruit bunch evacuation, by creating dump truck queues in the evening. 	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	<p>Non-Conformance: PT. Ketapang Agro Lestari – Ketapang Agro Lestari POM and its supply base cannot provide filled up/completed RSPO metrics template prior to an RSPO Certification.</p>	Non-compliance
<p>Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Estate:</p> <p>Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p> <ul style="list-style-type: none"> Sample taken: Operational Best Practices-Pembibitan No. MN.FR.COP.OPA.PBT dated 1 July 2012. The SOP contains Definition, responsibility, policy – related to location and hectarage of nursery area, water availability, oil palm seedling orders. There are two types of nursery – one stage and two-stage nursery. Pre-nursery stage and main-nursery stage explains receiving, counting and planting of seedling (including identification of abnormal seedling), watering the seedling, fertilizer application, pest and disease management for pre-nursery, weed control, seedling selection, nursery census and administrative control. There is no 	Complied

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		<p>changes on their operational procedure for Mill and Estates.</p> <ul style="list-style-type: none"> SOP Agronomy – Operational Best Practices Oil Palm Agronomy dated 1 July 2012, divided into: Book 1: Nursery No.FR.COP.OPA.PBT, Land Preparation No.FR.COP.OPA. PLH up to Manuring/Fertilizing No.FR.COP.OPA.PMK. Book 2: Pest & Disease Control Management No.FR.COP.OPA.PHT, up to Replanting No.FR.COP.OPA.PRM. This SOP also consist of working instruction for receiving the seedling WI.FR.COP.CA.OPA.PBT.01 – Penerimaan Kecambah, WI.FR.COP.CA.OPA.PBT.02 – Perhitungan dan Seleksi Kecambah, WI.FR.COP.CA.OPA.PBT.03 – Penanaman Kecambah di Persemaian, WI.FR.COP.CA.OPA.PBT.04 – Perlakuan Pemisahan Bibit Ganda, WI.FR.COP.CA.OPA.PBT.05 – Penanaman Bibit di pembibitan Utama. Standar Pengukuran ST.FR.COP.OPA.PBT. There are also working instructions for the processing. <p>Mill</p> <p>KAL POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK. Those documents above are available in each unit.</p> <p>Based on Manuring Procedures obtain information that to increasing soil fertility and maximizing yield, estates using organic fertilizer beside inorganic. For example, EFB application with dosage 35 – 40 ton/Ha in normal soil. During the field visit in Block B-11 Afdeling II PT KAL Estate observed the EFB application in interrow.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>To ensuring field implementation consistent with procedures, management has a mechanism such as:</p> <ul style="list-style-type: none"> Annual Visit Agronomy and Visit Engineering. Last visit in Ketapang Agro Lestari Estate on 22 June 2020 and 27 May – 8 June 2021. For Visit Engineering last visit has conducted on 25 March – 2 April 2020. 	Complied

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		<ul style="list-style-type: none"> • Annual Quality Control visit conducted by Quality Control Assistant. • Monthly Management Meeting. For example, there is a record of management meeting Ketapang Agro Lestari Estate on # August 2021 that attended by group Manager, Estate Manager, field assistant and head clerk. • Internal audit RSPO was carried out on 23-25 June 2021, reported on "Laporan Internal Audit RSPO – Kebun & Mill PT. Ketapang Agro Lestari". Internal Auditor Fajar Widya Darma and Eska Arganita. <p>During the audit, auditor has interview QC staff for estate and mill. Through the interview obtain information as follows:</p> <ul style="list-style-type: none"> • QC in estate conducted regularly at least once a month. The items that shall verify is quality of harvesting (circle, harvesting path and FFB/loose fruit left), manuring, upkeep in immature area and replanting. • QC in mill conducted regularly at least once a month. Items to check such as quality of sortation in loading ramp, sterilizer, USB check, LTDS, wet shell, fibre cyclone, temperature in clarification, kernel silo and press station, mass balance of solid and liquid and calibration of CPO/PK production in laboratory. 	
3.3.3	Records of monitoring and any actions taken are maintained and available.	During the audit, auditor has observed the records of following action after Visit Agronomy and Visit Engineering as mentioned in the <i>Laporan Hasil Audit – LHA Report</i> . There is some action plan to follow up the findings. Some issues that captured during the visit was the pruning progress.	Complied
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders,	<p><u>Social Environmental Impact Assessment:</u> Social Environmental Impact Assessment of PT Ketapang Agro Lestari has been conducted before planting and operational of mill and</p>	Complied

	<p>inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p>plantation. Initial Environmental Impact Assessment conducted on 2010 by independent consultant. EIA has involving the affected stakeholders including Village (Kampung) Kiaq, Tendiq, Penawang and Lendian Liang Nayu. Evidence of EIA study and stakeholder involvement can be demonstrated as in AMDAL document. EIA document has been revised and amendment on 2019 by Independent Consultant CV Aprilia Borneo due to additional mill capacity planning from 60 mt/hr in to 90 mt/hr.</p> <p>EIA document are available in:</p> <ul style="list-style-type: none"> - Analisis mengenai Dampak Lingkungan (AMDAL) Kegiatan Perkebunan dan Pabrik Minyak Sawit di Kampung Kiaq, Tendiq, Penawang, Lendian Liang nayuq kecamatan Siluq Ngurai Kabupaten Kutai Barat, Provinsi Kalimantan Timur, Juni 2010. Ruang lingkup AMDAL berdasarkan Izin lokasi seluas 15.025 ha dan kapasitas Pabrik 60 ton TBS/jam. - Adendum AMDAL dan RKL-RPL Kegiatan Perkebunan Kelapa Sawit dan Pabrik Minyak, Peningkatan Kapasitas Pabrik Minyak Sawit dari 60 Ton TBS/jam menjadi 90 ton TBS/jam, 2009. Izin kelayakan Lingkungan No: 660/11/DPMPSTP-III.SP/III/2020. <p>EIA scope has included all area of Izin lokasi 15,025 ha and included all activity planning of mill and plantation.</p> <p>Environmental impact assessment covered in AMDAL, RKL RPL document and environmental aspect and impact, e.g:</p> <p><u>Pre construction:</u></p> <ul style="list-style-type: none"> • Legal and permit process • Socialization and public consultation • Land compensation <p><u>Construction:</u></p> <ul style="list-style-type: none"> • Employee recruitment 	
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		<ul style="list-style-type: none"> • Material, equipment and employee mobilisation • Block and Afdeling mapping and setting • Facility construction • Land clearing and drainage • Nursery • Soil and water conservation • Oil palm planting • Uppeeking/plantation maintenance • Mill construction and supporting facility • Corporate social responsibility <p><u>Operation:</u></p> <ul style="list-style-type: none"> • Harvesting and transportation of FFB • Mill operation and waste management • Land application <p><u>Post operation:</u></p> <ul style="list-style-type: none"> • Replanting • HGU renewal <p><u>Social Impact Assessment:</u></p> <p>Another Social Impact Assessment has been conducted by independent consultant from "Fakultas Kehutanan Institut Pertanian Bogor" on July 2010.</p> <p>The SIA method was taken by participatory ways and involving the affected stakeholder at study location in 4 villages Kampong Lendian Liang Nayuq, Kampong penawang, Kampong Tendiq and Kampong Niaq.</p> <p>Social Environmental impact assessment was conducted through regular environmental monitoring, e.g. river water quality, mill effluent quality,</p>	
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		<p>air emission, economical condition, social and culture of community and wildlife conservation.</p> <p>Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan RKL - RPL". Report semester I (Period January – June 2021) has been sent to the government on 14 September 2021 (Dinas Lingkungan Hidup Kab. Kutai Barat), 9 July 2021 to Dinas Lingkungan Hidup Provinsi Kalimantan Timur. Evidence of report submission can be shown as per "Tanda Terima" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK.</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p>	<p>Environmental management and monitoring plan has been develop as per:</p> <ul style="list-style-type: none"> - Rencana Pengelolaan Lingkungan (RKL) and Rencana Pemantauan Lingkungan (RPL) - Rencana Pengelolaan Sosial PT Ketapang Agro Lestari <p>Both environmental management plan and its monitoring plan has been developed with participation of affected stakeholder in 4 villages Kampong Lendian Liang Nayuq, Kampong penawang, Kampong Tendiq and Kampong Niaq. Evidence of participation and consultation can be shown in the SEIA document.</p> <p>Environmental management and monitoring plan according to RKL-RPL are among others:</p> <ul style="list-style-type: none"> - Control emission of vehicle, genset and boiler by regular preventive maintenance and emission monitoring/analysis by laboratory each semester. - Control surface and ground water quality by waste handling according to regulation and water quality monitoring/analysis by laboratory each semester. 	<p>Complied</p>

		<ul style="list-style-type: none"> - Control the biodiversity lost by HCV and HCS management and monitoring, prohibit and prevent illegal hunting. - Control water biota disturbance by conserving the riparian area and water quality analysis by laboratory particularly water biota in each semester. - Control social impact by open the employment vacancy for local people, involve local people for company employee basic needs, using local contractor and monitoring the community livelihoods and their perception against company existence. 	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>Social Environment management and monitoring plan as per RKL – RPL document and Rencana Pengelolaan Dampak Sosial has been implemented by PT Ketapang Agro Lestari. Based on verification on Environmental management and monitoring report “Laporan Pelaksanaan RKL dan RPL” and “Evaluasi SIA melalui Pengelolaan dan Pemantauan Sosial” confirmed that the management and monitoring plan has been implemented accordingly. Data verified during audit :</p> <ul style="list-style-type: none"> • Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester. Latest monitoring and analysis on 11 March 2021 by Laboratorium Pusat Penelitian Lingkungan Hidup dan Sumberdaya Alam Universitas Mulawarman, Analysis report Nomor LHU: 02 & 03/LHU/LAB.U/III/2021 shown that the air quality, Odor and noise are met with the quality standard/threshold. • Air emission quality monitoring for vehicle, genset and boiler has been conducted on 11 March 2021 by Laboratorium Pusat Penelitian Lingkungan Hidup dan Sumberdaya Alam Universitas Mulawarman, Analysis report Nomor LHU: 02/LHU/LAB.U/III/2021 shown that the air emission are met with the quality standard/threshold. 	Complied

		<ul style="list-style-type: none"> • Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Perfomed by waste water quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Surface water quality monitoring and analysis in Sungai Tuang by Laboratorium Pusat Penelitian Lingkungan Hidup dan Sumberdaya Alam Universitas Mulawarman dated 11 March 2021 shown that water quality has been met with the standard PP Nomor 82 tahun 2001. • Flora fauna monitoring perfomed by wildlife monitoring and monitoring the conservation area (HCV) each month. Monitoring Since January - June 2021 at Ketapang Agro Lestari Estate shown that there were species of mammal <i>Hylobates muelleri</i>, <i>Macaca fascicularis</i>, <i>Callosciurus notatus</i> ; 11 species of birds (such as: <i>Gracula religiosa</i>, <i>Annorhinus galeritus</i>, <i>Pycnonotus goiavier</i>, <i>pycnonotus aurigaster</i>); Species of reptile (<i>Varanus salvator</i>) • Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through stakeholder meeting questioner each year. Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 4 october 2021, questioner of public perception can be demonstrated and well documented in "Evaluasi SEIA Melalui Pengelolaan dan Pemantauan Sosial". Generally public perception was positive regarding the company presence and contribution to the surrounding community. <p>The implementation report has been evaluated and reviewed and reported to government agency per semester (six monthly).</p>	
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		<p>Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan RKL - RPL". Report semester I (Period January – June 2021) has been sent to the government on 14 September 2021 (Dinas Lingkungan Hidup Kab. Kutai Barat), 9 July 2021 to Dinas Lingkungan Hidup Provinsi Kalimantan Timur. Evidence of report submission can be shown as per "Tanda Terima" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK</p>	
<p>Criteria 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p>	<p>The company has a procedure for employee recruitment, recorded in the Rekrutment Karyawan Harian Tetap Procedure Doc. No. AD.PNK.HRD.R&S.0002.001.</p> <p>Separately, PT KAL has set requirements for employee recruitment in the Company Regulations (PP) for the 2019-2021 period, in Chapter III concerning Employment Relations, which explains:</p> <ul style="list-style-type: none"> - Article 9: related to basis of acceptance, placement and transfer of employees - Article 10: related to general requirements for recruitment, including the minimum age requirement of 18 years and medical examination - Article 11: related to probationary period period for 3 months - Article 15: related to promotion - Article 49; concerning Termination of Employment (PHK: Pemutusan Hubungan Kerja) which refers to Law no. 13 of 2003. - Article 50; Termination of Employment - Article 55; Retirement: employees who are 57 (fifty-seven) years old can be honorably dismissed with pension rights in accordance with applicable regulations and or applicable company policies. 	<p>Complied</p>

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		The Company Regulation is valid from December 20, 2019 – December 20, 2021 and has been approved based on the Decree of Kepala Dinas Tenaga Kerja dan Transmigrasi kabupaten Kutai Barat Regency No. 568/2713/DTKT-BPTKHI/XII/2019 dated December 10, 2019 and has been registered with the Dinas Tenaga Kerja dan Transmigrasi Kabupaten Kutai Barat Regency cq. Bidang Perlindungan Tenaga kerja dan hubungan Industrial no. 25/PP-XII/2019.	
3.5.2	Employment procedures are implemented and records are maintained.	<p>The company has a procedure for employee recruitment, recorded in the Rekrutment Karyawan Harian Tetap Procedure Doc. No. AD.PNK.HRD.R&S.0002.001.</p> <p>Separately, PT KAL has set requirements for employee recruitment in the Company Regulations (PP) for the 2019-2021 period, in Chapter III concerning Employment Relations, which explains:</p> <ul style="list-style-type: none"> - Article 9: related to basis of acceptance, placement and transfer of employees - Article 10: related to general requirements for recruitment, including the minimum age requirement of 18 years and medical examination - Article 11: related to probationary period period for 3 months - Article 15: related to promotion <p>Verification of employee appointment documents: Appointment of employees, based on the decision letter from the Group Manager No. GM/SK-INT/II-2015 dated 11 February 2015 concerning Appointment of Permanent Employees (KHT) on behalf of Esterius A. as Harvester.</p>	Complied
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.	PT Ketapang Agro Lestari has established a health and safety policy under ""SK Direksi Nomor: 001/SUSTAINABILITY_FR/P/IX/2011 Tentang Kebijakan Lingkungan, keselamatan dan Kesehatan Kerja (K3)	Non-compliance

		<p>First Resources Ltd dan Anak Perusahaannya” tanggal 20 September 2011.</p> <p>According to company policy, the company commit to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation.</p> <p>HIRADC for PT Ketapang Agro Lestari both Mill and Estate have been prepared, last review and update January 2021 covering all activities and location for mill scope: office, mill road area, security pos, parking area, all station mill, laboratory, POME instalation/IPAL; and Estate scope: Office, Housing, Material storage (fertilizer, fuel, agrochemical, sparepart, building material, etc), upkeeping (manual upkeeping and chemical upkeeping), harvesting, FFB transportation, hazardous and domestic waste handling, road maintenance, vehicle maintenance (traksi), etc.</p> <p>The risk analysis and assessment has been performed according to company procedure.</p> <p>Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p> <ul style="list-style-type: none"> • Elimination of risk • Subtitution of material and process • Engineering control • Administrative control • Personal protective equipment. <p>Engineering control was implemented to prevent hearing loss, e.g. install noise reduction agent and administrative by erected signboard of noise area, as described in Risk.</p> <p>Administrative control was performed by employee mutation/rotation, sanction for safety rules violation. Safety inspection was performed regularly to ensure the compliance of safety regulation.</p>	
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		<p>PPE was provided for all employee according to each type of jobs. Safety shoes was provide twice a year for all process operator including mechanic. Monitoring of PPE usage can be demonstrated on document "Monitoring penggunaan APD" period January - November 2020 for each station.</p> <p>During Pandemic Covid-19, company has develop the business continuity plan (BCP) as a health protocol to prevent the covid-10 outbreak. The health protocol during working such as:</p> <ul style="list-style-type: none"> - Temperature check before working, if the body temperature > 36.5° C the workers must be referred to the clinic and may not work for further examination - Applying 3M (washing hands, keeping a social distancing and using a masker everywhere) - Restrictions on the movement of employees in and out of the plantation area and monitor the employees movement through permit. <p>Based on interview and verification, currently there is no case of positif covid-19 in PT Ketapang Agro Lestari. For any case of covid-19, company has provide the house for quarantine and paramedic to handle and cooperate with local health facility (Puskesmas) and hospital.</p> <p>Non conformity found during audit:</p> <p>There is no risk identification record in HIRAC for agrochemical mixing activity in the field/warehouse.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>PT Ketapang Agro Lestari has demonstrated the record of realization the OHS program 2021, such as:</p> <ul style="list-style-type: none"> - OHS and environmental socialisation at mill and estate, socialization regarding basic of OHS and occupational illness - Socialization of hazardous waste handling according to OHS standard for warehouse personel 	<p>Non-compliance</p>

		<ul style="list-style-type: none"> - First aid training - Fire prevention equipment monitoring - Monitoring of accident and occupational illness - Housekeeping monitoring - Hazard identification, risk assessment and risk control - PPE provision for workers mill and estate - Safety and environment inspection - Safety committee (P2K3) meeting - Reporting of P2K3 activity to manpower office. <p>Based on field visit for spraying workers in block B74 Afdeling IV the risk impact probability was irritate and eyes disease, control by using appropriate PPE (eye wear/safety glasses, masker and handgloves) and regular training for sprayer workers.</p> <p>Dicipline of PPE usage monitoring regularly conducted by Estate management to ensure all workers use the appropriate PPE during working. Monitoring record present in "Daftar Pemeriksaan Alat Pelindung Diri (APD)". Sample seen for PPE monitoring of fertilizer workers, spraying workers and harvester period January - March 2021.</p> <p>Monitoring of emergency response and peparedeness facilities, i.e: fire hydrant and fire prevention equipment. Based on field visit in Palm Oil Mill, the performance of hydrant was well function. Record of fire prevention equipment monitoring present in "Catatan Hasil Pemeriksaan Peralatan Tanggap Darurat" latest monitoring dated 24 August 2021. Fire fighting team and emergency response team has been formed as per "Satuan tugas pengendalian kebakaran lahan dan kebun dan kesiapsiagaan tanggap darurat", latest updated on August 2021.</p> <p>Safety committee meeting has been done each month and the report of OSH activity was reported each quarter to Manpower office (Dinas Tenaga Kerja Provinsi Kalimantan Timur). Report verified for quarter 3</p>	
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		<p>& 4 year 2020 and quarter 1 and 2 year 2021. For example report quarter II has been submitted on 9 September 2021 as per "Form Serah Terima".</p> <p>Non conformity found during audit:</p> <p>During field visit to workshop mill, found unsafe condition: 2 welder equipment is connected to electricity but there is no welder operator on site.</p> <p>One of the welder equipment connected to the electricity without standard connector, only wires attached to the plug/socket.</p> <p>During field visit to workshop area, found unsafe condition where there is an excavated pond that is deep enough and waterlogged but not given a barrier.</p>	
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p>	<p>The company has provide a training programme for workers according to the identification of training needs. Training programme provide as per "Learning & Development Program 2020/2021".</p> <p>Through its employee data (master of Employees) and training data personal records, HR Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p> <p>The training program is divided into several aspects: regular technical training for mandore/foreman, managerial and leadership training for staff, technical refreshment, operator certification training, Administration, Environments & OHS training.</p> <p>The following is a 2021 period training program for PT KAL, including:</p> <ul style="list-style-type: none"> - Regular technical training for mandore/foreman "Pelatihan mandor Tanaman" target attendance 124 person, has been conducted since January – August 2021. 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Managerial and leadership training for staff, target 31 staff for mill and estate. Has been conducted on April and Mei 2021. - Technical refreshmment training are including: <ul style="list-style-type: none"> ✓ Problem solving of production, target 25 person, conducted on April 2021 ✓ Management Afdeling for new staff, target 4 new staff, conducted on February 2021 ✓ Clinic mandor/Mandor refreshment training, target 123 person, conducted on January, February and August 2021 ✓ Pest and disease control training, target 29 person, conducted on August 2021 ✓ Refreshment technical mill, target 10 person, conducted on February 2021. - Administration training for staff and administration workers, target 130 participant, conducted on April 2021 - Refreshment of BPJS regulation, target participants 14, conducted on April 2021 - Fire prevention training, target 72 participants, conducted on April 2021. 	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>The training realisation based on the Learning & Development Program 2020/2021, including:</p> <ul style="list-style-type: none"> - Regular technical training for mandore/foreman "Pelatihan mandor Tanaman" target attendance 124 person, has been conducted since January – August 2021. - Managerial and leadership training for staff, target 31 staff for mill and estate. Has been conducted on April and Mei 2021. - Technical refreshmment training are including: 	Complied

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		<ul style="list-style-type: none"> ✓ Problem solving of production, target 25 person, conducted on April 2021 ✓ Management Afdeling for new staff, target 4 new staff, conducted on February 2021 ✓ Klinik mandor/Mandor refreshment training, target 123 person, conducted on January, February and August 2021 ✓ Pest and disease control training, target 29 person, conducted on August 2021 ✓ Refreshment technical mill, target 10 person, conducted on February 2021. - Administration training for staff and administration workers, target 130 participant, conducted on April 2021 - Refreshment of BPJS regulation, target participants 14, conducted on April 2021 <p>Fire prevention training, target 72 participants, conducted on April 2021. The company has also made recording for all trainings that have been attended by employees in the recording of "Personal Data Training".</p> <p>Some documents can be shown at the time of the audit as proof is: the Calendar Training document period 202/2021, the list of participants attending the trainees, and some photographs of the activities at the time of training.</p>	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p>	<p>The unit of certification has conducted the training for personnel carrying out the task to the effective implementation of the SCCS, the evidence has shown during audit, for example:</p> <ul style="list-style-type: none"> - Indra Zulkarnain & Nunik W., Sustainability Department, has attend external training of Supply Chain Certification Training Course by David Ogg. on 19-20 July 2018. External Training of SCCS by Mutu Insitute on 21-22 December 2020. 	Complied

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		<ul style="list-style-type: none"> - Eska Arganita, External Training of SCCS by Mutu Insitute on 21-22 December 2020. - Eko Darmawanto, Sustainability Department, has attend internal training of SCCS on 2 August 2018, and refresh of SCCS Training on 28 December 2020. - Satria P. Tarigan (Mill Manager of KAL POM), has attended internal training of SCCS on 21 June 2021, - Desika Situmorang (Weighbridge Clerk), has attended internal training of SCCS on 21 June 2021, - Lilis M Tugotorop (Weighbridge Clerk), has attended internal training of SCCS on 21 June 2021. - Yudi A Sinaga (Weighbridge Clerk), has attended internal training of SCCS on 21 June 2021. - Simon (Head of Assistance), has attended internal training of SCCS on 21 June 2021. - Pardomu Panggabean (Production Clerk), has attended internal training of SCCS on 21 June 2021. 	
<p>Criteria 3.8: Supply chain requirements for mills.</p>			
<p>Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
<p>3.8.1</p>	<p>Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB</p>	<p>The unit of certification uses RSPO Supply Chain Certification Standard module Mass Balance. Not Applicable</p>	<p>Not Applicable</p>

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	without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT Ketapang Agro Lestari – Ketapang Agro Lestari POM has defined RSPO Supply Chain model Mass Balance Module (Module E – CPO Mill: Mass Balanced).</p> <p>With the implementation of Module E – CPO Mill: Mass Balanced, PT Ketapang Agro Lestari – KAL POM received FFB from own estate (Ketapang Agro Lestari Estate) and other sources.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially produce by PT Ketapang Agro Lestari – Ketapang Agro Lestari POM has been derived from actual tonnage produced and this can be further verified in the Surveillance Audit (ASA-1) after the Ketapang Agro Lestari POM has been certified.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>PT. Ketapang Agro Lestari – Ketapang Agro Lestari POM has been registered in the RSPO IT Platform RSPO_PO1000008567 for Ketapang Agro Lestari POM, RSPO Membership for PT Ketapang Agro Lestari number 1-0047-08-000-00 since 10 March 2008.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p>	<p>PT Ketapang Agro Lestari - KAL POM demonstrates Standard Operating Procedures which complete and up to date covering the implementation of all the elements in RSPO Supply Chain requirements.</p> <p>PT Ketapang Agro Lestari – KAL POM can demonstrate procedures, such as:</p> <ol style="list-style-type: none"> 1. "Mekanisme Rantai Pasok RSPO" FR.CSM.MRPR Rev.01 dated 20 December 2018. The procedures cover traceability of palm products 	Non-compliance

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	<p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>(CPO and PK) since receiving of fresh fruit bunches from Ketapang Agro Lestari Estate and external supplier (direct and indirect sources), processing of up to shipping of CPO and PK as well as Daily production report KAL POM.</p> <p>The procedure also regulates the internal audit by Corporate Sustainability. Traceability records are to be kept for 10 years. The SOP Traceability covers responsibility for implementation of RSPO Supply Chain Module E: CPO Mills Mass Balance.</p> <p>PT. Ketapang Agro Lestari have established Work Instruction General Corporate Communication No.WI-M-OP-001 dated 9 November 2018. The work instruction describe requirement of RSPO Market Communication and Claims.</p> <p>PT. Ketapang Agro Lestari – Ketapang Agro Lestari POM demonstrated procedure "Corporate Sustainability Management Procedures Mekanisme Rantai Pasok RSPO No.FR.CSM.MRPR Rev.01" dated 22 April 2021; Section 6 Roles and Responsibility explains <u>Corporate Sustainability</u>: responsible for developing supply chain certification standard in First Resources Group, ensure this procedure in line with traceability norm and acceptable sustainability norm, to review this procedure implementation, verifies the compliance and PIC’s commitment periodically during RSPO Internal Audit, conduct SCC supplier validation verification, prepare UML list. <u>Marketing Region</u>: Ensure RSPO certificate for sales and purchase of RSPO product, ensure receiving and shipping of RSPO product’s administraton is complete, to report to CB in case of RSPO product projected overproduction, prepare MB calculation, prevent double accounting, update real stock and credit RSPO. <u>Corporate Mill</u>: Monitor the implementation of supply chain certification, to report to Marketing Region and Corporate Sustainability if projected overproduction. <u>Mill Weighbridge Officer</u>: To prepare marking to identify FFB status for RSPO certification/other certification/non-</p>	
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		<p>sustainable, ensure RSPO delivery as per Delivery Order/Purchase Contract from Marketing Region.</p> <p>PT KAL - KAL POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain's general requirement and modular requirement, including training records (see indicator 3.7.3).</p> <p>During audit, PIC is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>Non-Conformance:</p> <p>Based on document review SOP "Mekanisme Rantai Pasok RSPO" FR.CSM.MRPR Rev.01 dated 20 December 2018. It was known that SOP has not explained in detail the day limit in informing certificates status when suspended or terminated to their supply chain clients.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>As per Procedure of Traceability "(FR.CSOP.MRP.016 "Mekanisme Rantai Pasok") dated 9 December 2019 and "Corporate Sustainability Management Procedures Mekanisme Rantai Pasok RSPO No.FR.CSM.MRPR Rev.01 dated 22 April 2021, Sustainability Internal Audit Manager conducted internal audit to ensure implementation and administration are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Internal audit shall be conducted 1 times in a year. In 2021 internal audit conducted on 23-25 June 2021,</p> <p>The non-conformity has raised during audit, and company has stated Corrective Action Plan (CAP) for NCR Closure, based on document review all nonconformance has been closed by the management.</p>	Complied

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<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT. Ketapang Agro Lestari – Ketapang Aggro Lestari POM demonstrated procedure of Traceability “(FR.CSOP.MRP.016 “Mekanisme Rantai Pasok”) dated 9 December 2019 and “Corporate Sustainability Management Procedures Mekanisme Rantai Pasok RSPO No.FR.CSM.MRPR Rev.01 dated 22 April 2021.</p> <ul style="list-style-type: none"> • Section 5.1.1 described FFB Receiving – Corporate sustainability informing Marketing Region, Group Manager/Estate Manager of the certification period and PalmTrace license of the certified estates; Weighbridge officer carried out marking of FFB status identification, i.e.: RSPO-certified/other certification system/non-sustainable; For RSPO-certified FFB, marked with RSPO certificate number, “Certified”, and “MB” mark on the “Surat Pengantar TBS”. Non-sustainable (non-certificate) FFB marked with “Non-sustainable” mark on the “Surat Pengantar TBS”. • Section 6.2.4 stipulates reporting to certification body related to overproduction, minimum 3 months from surveillance audit carried out – if the production projection over the quota in RSPO certificate/RSPO IT Platform. • Section 5.8 Penanganan Ketidaksesuaian atau Komplain” mentioned that nonconformity may occurs between SPO status, Delivery Order document and certification declaration on SPO delivery note. Weighbridge clerk inform Marketing Department, then Marketing Department perform action to revise the document or reject the product. Furthermore in “Corporate Sustainability Management Procedures – Ketelurusan dan Keseimbangan Masa di Kebun dan Pabrik Kelapa Sawit” No.FR.CSM.MTM dated 13 July 2018, Section “3.16 Penanganan Produk yang Tidak Sesuai” stated non-conforming product shall not release to market and to be corrected in order to meet customer requirements or to be used for other purpose or be eliminated. 	<p>Complied</p>
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		The record of actual tonnage produced will be verify further at ASA-1 after the mill has been certified. Currently there is no over production due to the product has not been declared as certified.	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	The Ketapang Agro Lestari POM has no certified yet. The minimum information for RSPO Certified Product on sales will be verified at annual surveillance audit.	Complied
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification. 	<p>The transport for RSPO certified sustainable CPO and PK delivery were carried out by numbers of transporter. Letter of Agreement is available between the company and CPO/PK Transporter for period Y 2021 e.g.:</p> <p>CPO Transporter</p> <ul style="list-style-type: none"> • PT Jaya Harapan Nusa Sejahtera. Contract based on "Perjanjian Pengangkutan CPO" No.KAL/078/SPJP/XII-20/DIR dated 31 December 2020. Address: Jl. Siak II No. 98 RT.003 RW 003 	Complied

	<p>ii) The mill shall ensure the following:</p> <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 	<p>Kelurahan Labuh Baru Barat, Kecamatan Payung Sekaki, Kota Pekanbaru, Provinsi Riau.</p> <p>PK Transporter</p> <ul style="list-style-type: none"> • CV Inti Jaya. Contract based on "Pengangkutan Kernel" No. KAL/016/SPJP/I-21/DIR dated 04 January 2021. Address: Jl Adam Malik, Perum Citra Griya. F.12, RT 22, Kel. Karang Asam Ilir, Kec. Sungai Kunjang. Represented by Riki Anggara. This contractor was appointed, contracted and instructed by PT Ketapang Agro Lestari. Address: Jl. MT Haryono No. 168A, RT.16, Kelurahan Gunung Samarinda Baru, Kecamatan Balikpapan Utara, Kota Balikpapan, Provinsi Kalimantan Timur. 	
<p>3.8.10</p>	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>PT. Ketapang Agro Lestari – Ketapang Agro Lestari POM has recorded the name and contact details for all third-party transporter,</p> <p>CPO Transporter</p> <p>PT Jaya Harapan Nusa Sejahtera. Contact Person: Johan Arifin. Address: Jl. Siak II No. 98 RT.003 RW 003 Kelurahan Labuh Baru Barat, Kecamatan Payung Sekaki, Kota Pekanbaru, Provinsi Riau.</p> <p>PK Transporter</p> <p>CV Inti Jaya. Contact Person: Riki Anggara. Address: Jl Adam Malik, Perum Citra Griya. F.12, RT 22, Kel. Karang Asam Ilir, Kec. Sungai Kunjang. Represented by Riki Anggara. This contractor was appointed, contracted and instructed by PT Ketapang Agro Lestari. Address: Jl. MT Haryono No. 168A, RT.16, Kelurahan Gunung Samarinda Baru,</p>	<p>Complied</p>

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		Kecamatan Balikpapan Utara, Kota Balikpapan, Provinsi Kalimantan Timur.	
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Based on interview with the Mill Manager showed that there were no new contractors.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	The mill 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 SCCS requirements.	Complied

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3.8.13	<p>Extraction Rate The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The mill has not certified yet, so that the site does not apply a conversion rate.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The mill has not certified yet, so that the site does not apply a conversion rate.</p>	Complied
3.8.15	<p>Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Based on interview with the management and field observation, Ketapang Agro Lestari POM will apply the Mass Balance Module. The POM receives fruit from the own estate, scheme smallholder, and other sources.</p>	Complied
3.8.16	<p>Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>The mill has not certified yet, so there is no transaction or claim that has been registered in the RSPO IT Platform. This matter will be verified further at annual surveillance audit.</p>	Complied
3.8.17	<p>Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>The mill has not certified yet, so there is no transaction or claim that has been registered in the RSPO IT Platform. This matter will be verified further at annual surveillance audit. This matter will be verified further at annual surveillance audit.</p>	Complied

General corporate communications

4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>First Resources Limited, the parent company of PT. Ketapang Agro Lestari is highlighting their commitment to the principles of RSPO and has been registered as RSPO member with membership No.1-0047-08-000-00 since 10 March 2008.</p> <p>The corporate communication in the website can be found at http://www.first-resources.com/.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • State that the member supports the work of the RSPO • State the member's history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>First Resources Limited, in its website:</p> <ol style="list-style-type: none"> a. Display its RSPO membership status: First Resources Limited stated "Our sustainability policies have been guided by the Principles and Criteria set out by the Roundtable of Sustainable Palm Oil, which we have been a member of since 2008". b. Display the RSPO web address: No, First Resources Limited did not display the RSPO web address. c. State the member supports the work of the RSPO: Not in direct manner. In the website, First Resources Limited stated that the organization is a member of RSPO and are committed to adopting its principles and criteria; and stated the organization currently working towards achieving RSPO certifications for kernel crusher and the rest of mill and plantations by 2026. d. State the member's history with regards to the RSPO: Yes. In the website, First Resources Limited stated as of 31 December 2020, the organization have received RSPO certifications for three (3) of subsidiaries covering three (3) mills and more than 27,000 hectares of plantations located in the province of Riau. Both of refineries as well as kernel crushing plant are also RSPO-certified. The organization currently working towards achieving RSPO certifications for kernel crusher and the rest of mill and plantations by 2024. 	Complied

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		e. Use of RSPO Trademark to promote its membership of the RSPO: No, First Resources Limited did not use RSPO trademark in its corporate communication in the website.	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	No, First Resources Limited did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	No, First Resources Limited did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the First Resources Limited own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, First Resources Limited did not display its RSPO Corporate Logo in any document.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Ketapang Agro Lestari and their buyers.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	The mill has not certified yet, so there is no transaction or claim that has been registered in the RSPO IT Platform. This matter will be verified further at annual surveillance audit.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the	PT. Ketapang Agro Lestari – Ketapang Agro Lestari POM is not a distributor and/or wholesaler. Not applicable.	Not Applicable

	<p>product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>The mill has not certified yet, this matter will be verified further at annual surveillance audit.</p> <p>Not applicable.</p>	Not Applicable
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.</p>	<p>The mill has not certified yet, this matter will be verified further at annual surveillance audit.</p>	Complied
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>The mill has not certified yet, this matter will be verified further at annual surveillance audit.</p>	Complied
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>The mill has not certified yet, this matter will be verified further at annual surveillance audit.</p>	Complied

6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	The mill has not certified yet, this matter will be verified further at annual surveillance audit.	Complied
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	The mill has not certified yet, this matter will be verified further at annual surveillance audit.	Complied
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	The mill has not certified yet, this matter will be verified further at annual surveillance audit.	Complied
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	The mill has not certified yet, this matter will be verified further at annual surveillance audit.	Complied
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .	The mill has not certified yet, this matter will be verified further at annual surveillance audit.	Complied

MODULE B – MASS BALANCE SPECIFIC RULES

Minimum Mass Balance content

	95% or above of the oil palm content must be RSPO MB-certified.	The mill has not certified yet, this matter will be verified further at annual surveillance audit.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	The mill has not certified yet, this matter will be verified further at annual surveillance audit.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	The mill has not certified yet, this matter will be verified further at annual surveillance audit.	Complied
Messaging (MB)			

	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>The mill has not certified yet, this matter will be verified further at annual surveillance audit.</p>	<p>Complied</p>
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>PT KAL already has a human rights policy based on the Decree SK.No. 018 Sustainability-FR-P-03-2015 concerning Human Rights Protection Policy. And the Company has also set a policy based on the Circular Letter of the Group Manager of Plantations No. PH/SE/00/XI/2020 dated November 19, 2020 and has been revised based on Circular Letter of The Group Manager of Plantations No. PH/SE/007/VI/2021 dated 10 June 2021 regarding the Protection of Human Rights Defenders (HRD). Through this policy, PT KAL is committed that:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> - Point 1 "Everyone has the right to recognition, guarantees, protection related to human rights and to receive legal certainty and equal treatment before the law in force in Indonesia. - Point 2 "The company guarantees the freedom of employees in association and expressing opinions in accordance with the applicable legal rules in Indonesia". - Point 3 "The company guarantees the Protection of Human Right Defenders (HRD) in the company's operational". - Point 4 "The company does not use paramilitary/security services as intimidation in taking security measures within the company". - Point 6 "If workers find violations of the point above, they can immediately inform HRD (Human Resources Department), Internal Audit, and direct superiors". <p>According this policy, it has been shown that the company is committed to protect against Human Right Defenders, as explained in the company's latest policy points regarding the Protection of Human Right Defenders.</p> <p>This human rights policy has been socialized to all workers and all parties involved in plantation operations including third parties (CPO contractors, Kernel) on 19 November 2020 and 30 June 2021. Meanwhile, the socialization to the community around the plantation was carried out on 6 October 2021 which was attended by village heads and community leaders.</p> <p>Based on interview with the workers, supply chain and village heads/community leaders it was known that they are aware regarding the Company Policy of Protection of Human Right Defenders (HRD).</p>	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	PT KAL already has a human rights policy based on the Decree SK.No. 018 Sustainability-FR-P-03-2015 concerning Human Rights Protection Policy. And the Company has also set a policy based on the Circular	Complied

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		<p>Letter of the Group Manager of Plantations No. PH/SE/00/XI/2020 dated November 19, 2020 regarding the Protection of Human Rights Defenders.</p> <p>Through this policy, PT KAL is committed that:</p> <ul style="list-style-type: none"> - Everyone has the right to recognition, guarantee, protection related to human rights and to receive legal certainty and equal treatment before the law in force in Indonesia. - The company guarantees the freedom of employees in association and expressing opinions in accordance with the applicable legal rules in Indonesia - The company does not use security/services as intimidation in taking security measures within the company. - The company will impose strict sanctions on individuals/employees of the company who commit acts of violation of Human Rights within the company, including but not limited to Law no. 39 of 199 concerning Human Rights. <p>This human rights policy has been socialized to all workers and all parties involved in plantation operations including third parties (CPO contractors, Kernel) on 19 November 2020. Meanwhile, the socialization to the community around the plantation was carried out on 6 October 2021 which was attended by village heads and community leaders.</p> <p>Based on interview to all level of workers, contractors, scheme smallholders and stakeholders, confirm that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p>	
<p>Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and</p>	<p>PT Ketapang Agro Lestari already has a mechanism or information management system, namely Communication Procedure No. FR.EMS.CIE. Rev.01 dated February 24, 2020. This procedure also</p>	Complied

	<p>whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>describes the methods to assist the flow of information. Forms of information include requests for information from stakeholders (internal and external), complaints/dissatisfaction, conflicts, suggestions and consultations with the company.</p> <p>Submitting information from internal and external stakeholders to convey concerns/complaints/grievances regarding the activities of the First Resources Group and its suppliers and company associations can be sent via email to the Sustainability Department (sustainability@first-resources.com) according to the information on the website (http://www.first-resources.com) or send it to the estate office (location) or representative office.</p> <p>The Corporate Sustainability Head is responsible for coordinating with the Directorate/General Manager/Estate Manager/Mill Manager/Downstream Manager in order to respond to complaints and complaints from stakeholders related to the implementation of the EMS and SPO (sustainable Palm Oil).</p> <p>Every complaint received either through estate (local) and/or Regional Offices, the company will provide a response to stakeholders no later than 1 (one) month since the complaint is received and resolve or provide a follow-up response no later than 6 (six) months since the complaint is received.</p> <p>The mechanism for reporting violations (Whistle Blowing and Anonymity) with the following provisions:</p> <ul style="list-style-type: none"> - Reports or communications on the occurrence of violations in the company that are against the law, ethical/immoral acts or other actions that can harm the company or stakeholders are carried out in confidentiality and in good faith. - The company will guarantee the anonymity of the whistleblower/whistle blower through confidentiality, safety, 	
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		<p>reputation and good name for every stakeholder who submits a complaint to the company.</p> <p>Every complaint from internal and external stakeholders will be followed up fairly and transparently and will be posted on the First Resources Group website (http://www.first-resources.com). If the complaint cannot be resolved by both parties, then the complaint process is continued to the court which is agreed by both parties in accordance with the laws and regulations and if the complaint has not been resolved by the court, then the complaint can be lodged through the RSPO Complaint Panel mechanism.</p> <p>Based on interviews with several stakeholders: (Lendian Village Officials/Heads, CPO & Kernel Contractors, Disbun, DLH and Disnakertran, BPN Kutai Barat Regency), that for the 2020-2021 period (up to September 2021) there are no records related to complaints from stakeholders to PT Ketapang Agro Lestari.</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>PT Ketapang Agro Lestari already has a mechanism or information management system, namely Communication Procedure No. FR.EMS.CIE. Rev.01 dated February 24, 2020. This procedure also describes the methods to assist the flow of information. Forms of information include requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions and consultations with the company. Procedures are provided in Indonesian so they can be understood by stakeholders and communities around the plantation.</p> <p>Complaint procedure for those who cannot read and write (illiterate parties) is conveyed using audio media (voice recording) and representatives who can read and write.</p> <p>Based on interviews with several stakeholders: (Lendian Village Officials/Heads, CPO & Kernel Contractors, Disbun, DLH and Disnakertran, BPN Kutai Barat Regency), that for the 2020-2021 period</p>	Complied

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		(up to September 2021) there are no records related to complaints from stakeholders to PT Ketapang Agro Lestari.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	<p>PT Ketapang Agro Lestari already has a mechanism or information management system, namely Communication Procedure No. FR.EMS.CIE. Rev.01 dated February 24, 2020. This procedure also describes the methods to assist the flow of information. Forms of information include requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions and consultations with the company. Procedures are provided in Indonesian so they can be understood by stakeholders and communities around the plantation.</p> <p>Complaint procedure for those who cannot read and write, complaint procedure mechanism is conveyed using audio media (voice recording) and representatives who can read and write.</p> <p>Based on an interview with the DLH of Kutai Barat Regency (Bpk. Makulau), that in 2019 there were complaints from the public regarding the alleged pollution of Tuang River water by the Palm Oil Mill owned by PT KAL which resulted in a warning letter of administrative sanctions from the government.</p> <p>Related to the issue of the application of administrative sanctions of government coercion to PT KAL which was stipulated based on the Decree of the Regent of Kutai Barat No. 666.1/K.572/2019 dated April 8, 2019.</p> <p>In order to fulfil the obligation of administrative sanctions imposed by the government, PT KAL through the letter of the Director of PT Ketapang Agro Lestari No. KAL/005/V-19/UM dated May 16, 2019 regarding the request for verification of the report on the fulfilment of administrative sanctions obligations, the Head of the Environmental Service of the Kutai Barat Regency assigned a team to the field with a Task Order No. 090/67/DLH-PPKL/VI/2019 on June 14, 2019 which consists of:</p>	Complied

		<ul style="list-style-type: none"> a. Makkulau, S.Hut., M.A.P b. Maharan, S.Hut c. Lukman Moul Hakim, S. Hut d. Source Arif Fahrudin, ST e. Adrianus Susanto, S. Hut <p>The verification team has taken water samples at the following points:</p> <ul style="list-style-type: none"> 1. Upstream of the Pour River 2. Downstream of the Pour River 3. Outlets <p>Checking of water samples was carried out on June 18, 2019 based on the Prov. East Kalimantan No. 02 of 2011 concerning water management, Water Quality and Water Pollution Control. Based on a check from the DLH of Kutai Barat Regency, it was not proven that there was river pollution by PT KAL which resulted in administrative sanctions by the government.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>PT Ketapang Agro Lestari already has a mechanism or information management system, namely Communication Procedure No. FR.EMS.CIE. Rev.01 dated February 24, 2020. This procedure also describes the methods to assist the flow of information. Forms of information include requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions and consultations with the company. Procedures are provided in Indonesian so they can be understood by stakeholders and communities around the plantation.</p> <p>Complaint procedure for those who cannot read and write, complaint procedure mechanism is conveyed using audio media (voice recording) and representatives who can read and write.</p> <p>Based on an interview with the DLH of Kutai Barat Regency (Bpk. Makulau), that in 2019 there were complaints from the public regarding</p>	Complied

		<p>the alleged pollution of Tuang River water by the Palm Oil Mill owned by PT KAL which resulted in a warning letter of administrative sanctions from the government.</p> <p>Related to the issue of the application of administrative sanctions of government coercion to PT KAL which was stipulated based on the Decree of the Regent of Kutai Barat No. 666.1/K.572/2019 dated April 8, 2019.</p> <p>In order to fulfil the obligation of administrative sanctions imposed by the government, PT KAL through the letter of the Director of PT Ketapang Agro Lestari No. KAL/005/V-19/UM dated May 16, 2019 regarding the request for verification of the report on the fulfilment of administrative sanctions obligations, the Head of the Environmental Service of the Kutai Barat Regency assigned a team to the field with a Task Order No. 090/67/DLH-PPKL/VI/2019 on June 14, 2019 which consists of:</p> <ul style="list-style-type: none"> a. Makkulau, S.Hut., M.A.P b. Maharan, S.Hut c. Lukman Moul Hakim, S. Hut d. Source Arif Fahrudin, ST e. Adrianus Susanto, S. Hut <p>The verification team has taken water samples at the following points:</p> <ul style="list-style-type: none"> 1. Upstream of the Pour River 2. Downstream of the Pour River 3. Outlets <p>Checking of water samples was carried out on June 18, 2019 based on the Prov. East Kalimantan No. 02 of 2011 concerning water management, Water Quality and Water Pollution Control. Based on a check from the DLH of Kutai Barat Regency, it was not proven that there</p>	
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		was river pollution by PT KAL which resulted in administrative sanctions by the government.	
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	<p>The determination of the community development program at PT KAL is carried out by consulting with the surrounding community using the questionnaire distribution method. The last consultation was carried out through a questionnaire on 14 January 2021 by distributing 150 questionnaires.</p> <p>From the results of the questionnaire, the CSR program for the 2020-2021 period was evaluated and made.</p> <p>Based on an interview with the Head of Lendian Village, Mr. Edi Suriadinata that PT KAL in terms of formulating a development program for the surrounding village community with the method of direct consultation with community leaders and also through the distribution of survey sheets to the community.</p>	Complied
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	<p>Documents showing legal ownership of PT KAL and its supply bases are shown in place. Legal ownership of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land Title. Where the Land Title issued by National Land Department.</p> <p>Based on the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process, with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation.</p>	Complied

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		<p>The process of land acquisition is recorded in the considerations of HGU SK above. Detailed evidence in the land acquisition process (both compensation/benefit) in the form of a Land Acquisition Recapitulation, taken as a sample of data verification for the period 2010-2011, as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">No.</th> <th colspan="2">SP - TALI ASIH</th> <th colspan="2">PEMILIK</th> <th rowspan="2">LOKASI/DESA</th> <th rowspan="2">LUAS (Ha)</th> </tr> <tr> <th>Nomor</th> <th>Tanggal</th> <th>Nama</th> <th>Alamat</th> </tr> </thead> <tbody> <tr><td>1</td><td>001</td><td>28/11/2010</td><td>Syampurna</td><td>Penawang</td><td>Penawang</td><td>10,71</td></tr> <tr><td>2</td><td>002</td><td>28/11/2010</td><td>Syampurna</td><td>Penawang</td><td>Penawang</td><td>8,12</td></tr> <tr><td>3</td><td>003</td><td>28/11/2010</td><td>Asmuni</td><td>Penawang</td><td>Penawang</td><td>1,90</td></tr> <tr><td>4</td><td>004</td><td>28/11/2010</td><td>Amalia</td><td>Penawang</td><td>Penawang</td><td>5,52</td></tr> <tr><td>5</td><td>005</td><td>28/11/2010</td><td>Rintan</td><td>Penawang</td><td>Penawang</td><td>7,82</td></tr> <tr><td>6</td><td>006</td><td>28/11/2010</td><td>Seteny</td><td>Penawang</td><td>Penawang</td><td>3,78</td></tr> <tr><td>7</td><td>007</td><td>28/11/2010</td><td>Riat</td><td>Penawang</td><td>Penawang</td><td>2,24</td></tr> <tr><td>8</td><td>009</td><td>23/1/2011</td><td>Ngebe</td><td>Penawang</td><td>Penawang</td><td>1.246,28</td></tr> <tr><td>9</td><td>010</td><td>25/03/2011</td><td>Gamas</td><td>Penawang</td><td>Penawang</td><td>561,72</td></tr> <tr><td>10</td><td>011</td><td>04/11/2011</td><td>Sediah</td><td>Penawang</td><td>Penawang</td><td>850,29</td></tr> <tr><td>11</td><td>012</td><td>11/04/2011</td><td>Bisin</td><td>Penawang</td><td>Salaika'ak</td><td>52,08</td></tr> <tr><td>12</td><td>013</td><td>11/07/2011</td><td>Lahan Adat</td><td>Lendian</td><td>Lendian</td><td>648,00</td></tr> <tr><td>13</td><td>014</td><td>07/06/2011</td><td>Nyurung</td><td>Lendian</td><td>Lendian</td><td>64,40</td></tr> <tr><td>14</td><td>015</td><td>11/07/2011</td><td>Yunus</td><td>Penawang</td><td>Penawang</td><td>1.299,50</td></tr> <tr><td>15</td><td>016</td><td>22/02/2012</td><td>Rudi</td><td>Penawang</td><td>Penawang</td><td>128,10</td></tr> <tr><td>16</td><td>018</td><td>30/05/2012</td><td>Lahan adat Lendian</td><td>Lendian</td><td>Lendian</td><td>1.807,78</td></tr> <tr><td>17</td><td>020</td><td>22/10/2012</td><td>Bisin</td><td>penawang</td><td>penawang</td><td>59,00</td></tr> <tr><td>18</td><td>022</td><td>22/10/2012</td><td>Hadijah</td><td>Penawang</td><td>Penawang</td><td>60,75</td></tr> <tr><td>19</td><td>024</td><td>22/10/2012</td><td>Budianto</td><td>Lendian</td><td>Lendian</td><td>5,23</td></tr> <tr><td>20</td><td>026</td><td>22/10/2012</td><td>Yunus</td><td>Penawang</td><td>Penawang</td><td>142,25</td></tr> <tr><td>21</td><td>028</td><td>22/10/2012</td><td>Hadijah II</td><td>Penawang</td><td>Penawang</td><td>90,93</td></tr> <tr><td>22</td><td>030</td><td>22/10/2012</td><td>Ngebe</td><td>Penawang</td><td>Penawang</td><td>178,00</td></tr> <tr><td>23</td><td>032</td><td>22/10/2012</td><td>Sediah(12.0)</td><td>Penawang</td><td>Penawang</td><td>12,00</td></tr> <tr><td>24</td><td>034</td><td>22/10/2012</td><td>Sudi Ano MR dan Dedi Dores</td><td>Lendian</td><td>Lendian</td><td>109,51</td></tr> <tr><td>25</td><td>036</td><td>14/12/2017</td><td>Lahan Adat Lendian 3</td><td>Lendian</td><td>Lendian</td><td>377,00</td></tr> <tr><td>26</td><td>038</td><td>14/12/2017</td><td>Lahan Adat Lendian 4</td><td>Lendian</td><td>Lendian</td><td>481,42</td></tr> <tr> <td></td><td></td><td></td><td>TOTAL</td><td></td><td></td><td>8.214,33</td></tr> </tbody> </table> <p>The legal land use-rights for this scope as follow: Estate:</p> <ul style="list-style-type: none"> HGU Certificate No. 00225 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 1,425.08 Ha (NIB 16.11.00.00.00221) located in Penawang Village, 	No.	SP - TALI ASIH		PEMILIK		LOKASI/DESA	LUAS (Ha)	Nomor	Tanggal	Nama	Alamat	1	001	28/11/2010	Syampurna	Penawang	Penawang	10,71	2	002	28/11/2010	Syampurna	Penawang	Penawang	8,12	3	003	28/11/2010	Asmuni	Penawang	Penawang	1,90	4	004	28/11/2010	Amalia	Penawang	Penawang	5,52	5	005	28/11/2010	Rintan	Penawang	Penawang	7,82	6	006	28/11/2010	Seteny	Penawang	Penawang	3,78	7	007	28/11/2010	Riat	Penawang	Penawang	2,24	8	009	23/1/2011	Ngebe	Penawang	Penawang	1.246,28	9	010	25/03/2011	Gamas	Penawang	Penawang	561,72	10	011	04/11/2011	Sediah	Penawang	Penawang	850,29	11	012	11/04/2011	Bisin	Penawang	Salaika'ak	52,08	12	013	11/07/2011	Lahan Adat	Lendian	Lendian	648,00	13	014	07/06/2011	Nyurung	Lendian	Lendian	64,40	14	015	11/07/2011	Yunus	Penawang	Penawang	1.299,50	15	016	22/02/2012	Rudi	Penawang	Penawang	128,10	16	018	30/05/2012	Lahan adat Lendian	Lendian	Lendian	1.807,78	17	020	22/10/2012	Bisin	penawang	penawang	59,00	18	022	22/10/2012	Hadijah	Penawang	Penawang	60,75	19	024	22/10/2012	Budianto	Lendian	Lendian	5,23	20	026	22/10/2012	Yunus	Penawang	Penawang	142,25	21	028	22/10/2012	Hadijah II	Penawang	Penawang	90,93	22	030	22/10/2012	Ngebe	Penawang	Penawang	178,00	23	032	22/10/2012	Sediah(12.0)	Penawang	Penawang	12,00	24	034	22/10/2012	Sudi Ano MR dan Dedi Dores	Lendian	Lendian	109,51	25	036	14/12/2017	Lahan Adat Lendian 3	Lendian	Lendian	377,00	26	038	14/12/2017	Lahan Adat Lendian 4	Lendian	Lendian	481,42				TOTAL			8.214,33	
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		<p>Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054.</p> <ul style="list-style-type: none"> ▪ HGU Certificate No. 00226 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 3,230.5352 Ha (NIB 16.11.00.00.00222) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. ▪ HGU Certificate No. 00227 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 905.8800 Ha (NIB 16.11.00.00.00223) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. ▪ HGU Certificate No. 00228 issued by the Head of the Land Office of Kutai Barat Regency on December 12, 2019 on a land area of 93.2413 Ha (NIB 16.11.00.00.00224) located in Penawang Village, Lendian Liang Nayuq, Siluq Ngurai District, Kutai Barat Regency, valid until October 19, 2054. <p>HGU which is the scope of RSPO certificates is an area of 5,865.7052 Ha.</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>In period 2010 – 2017 that the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process, with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation.</p> <p>The process of land acquisition is recorded in the considerations of the HGU SK above. Detailed evidence in the land acquisition process (both compensation/benefit) in the form of a Land Acquisition Recapitulation,</p>	Complied

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	taken as a sample of data verification for the period 2010-2017, as follows:																																																																																																																																																																																																													
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Evidence of land acquisition/land compensation consists of, receipt of payment of compensation or "Tali Asih", map of the plot of land that was compensated, Minutes of measurement/map of land compensation, statement letter, samples taken:																																																																																																																																																																																																														
Letter of Agreement on Land As well as Planting and Building No. 09/kal/TA.Pnwg/I/2011 dated 23/01/2011 on behalf of Ngebe who resides in Penawang Village, Siluq Ngurai District, Kab. Kutai Barat, owner of KTP 6407171403580001 who legally owns a plot of land and all crops and buildings covering an area of 1,246.28 hectares located in																																																																																																																																																																																																														

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		<p>Penawang village, Kec. Siluq Nurai, Kab. Kutai Barat. Furthermore, land acquisition for the development of oil palm plantations is a partnership program.</p> <p>The agreement letter is also accompanied by supporting documents including:</p> <ul style="list-style-type: none"> - Land Map and coordinates - Minutes of Inventory of land, planting and building no. 09/KAL/TA.Pwg/x/2010 dated January 20, 2011 - Declaration of Land Ownership/Ownership (SPPAT) No. 09/KAL/TA.Pwg/x/2010 dated January 20, 2011 - Declaration Letter of Land Transfer and Planting and Building dated March 10, 2011 - Letter of Approval of Family/Heirs No. 09/SPAW/Pnwg/K.Slq/I/2011 dated 27 January 2011 - Statement Letter Not Doing Lawsuit/Calls In Any Form No. 09/Nbe-Pnwg/K.Slq/I/2011 dated 27 January 2011 - Statement letter from land owner stating the transfer of land to PT Ketapang Agro Lestari dated March 8, 2011 for an area of 1,246.28 Ha. - Receipt of payment of Tali Asih land area of 1,246.28 Ha to Br. Ngebe dated March 8, 2011 - Photos of the payment of Tali Asih funds by PT Ketapang Agro Lestari to Br. Hanging out in Penawang Village, Kec. Siluq Nurai 	
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>PT KAL has been developing this plantation since 2010. The land status is clear and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	

	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>Prior to developing the plantation, PT KAL had studied or analysed social and environmental impacts through the Environmental Impact Analysis (ANDAL) in June 2010 and has undergone changes through the ANDAL and RKL-RPL addendums in 2019, this was done due to an increase in capacity Factory from 60 tons/hour FFB to 90 tons/hour FFB.</p>	
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are available within HGU map namely "Peta Bidang Tanah", Doc. No. 019-16.11-2018 scale 1:30,000. This map is attached within HGU certificate.</p>	<p>Complied</p>
<p>4.4.4</p>	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p>	<p>During audit can be shown evidence that all the information (maps, agreement, records, impact assessment, benefit sharing and legal arrangements) is available in appropriate forms and provide on Bahasa Indonesia.</p> <p>All of this information can be accessed and known by the affected parties including the transparency delivery of the value of compensation received. Some information related to the indemnity process that can be accessed:</p> <ul style="list-style-type: none"> - Land Map and coordinates - Minutes of Inventory of land, planting and building. - Declaration of Land Ownership/Ownership (SPPAT) - Declaration Letter of Land Transfer and Planting and Building. - Letter of Approval of Family/Heirs. - Statement Letter Not Doing Lawsuit/Calls In Any Form - Statement letter from land owner stating the transfer of land to PT Ketapang Agro Lestari - Receipt of payment of Tali Asih - Photos of the payment of Tali Asih 	<p>Complied</p>

4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	In the process of acquiring land at PT KAL's plantation, the company involved a verification team consisting of 7 local villagers (Petinggi kampung, Ketua Adat, BPK, and other community leaders). According documents verification on audit i.e. Declaration of Land Ownership/Ownership (SPPAT), Declaration Letter of Land Transfer and Planting and Building and Letter of Approval of Family/Heirs. That in the acquisition of land in PT KAL has involved representatives of the local village community who can represent it and be elected through deliberation.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	The land acquisition process at PT KAL is carried out by respecting the rights of indigenous and local communities who legally or customary have land rights by referring to the principle of FPIC including not using military involvement in all land acquisition. Negotiation of sago liver/tali asih/ganti rugi/compensation for land acquisition with land owners is based on the average or market value that has been determined in advance in each area/garden and is always renewed if there is a change in value. The results of the negotiations are stated in the Negotiation Agenda & Price Agreement.	Complied
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	PT Ketapang Agro Lestari has obtained documents to identify and assess legal rights and uses. Identification and assessment is carried out by conducting a technical assessment. The results of this technical feasibility survey are then included in the Internal Feasibility Study Book. Based on the results of the identification and assessment related to the land ownership of the community around the PT KAL Plantation, it is divided into 3 major groups, namely: 1) Inherited Land, 2) Cultivated Land and Customary/Community Land.	Complied

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4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p>	<p>In the process of acquiring land at PT KAL's plantation, the company involved a verification team consisting of 7 local villagers (Petinggi Kampung, Ketua Adat, BPK, and other community leaders).</p> <p>This is to respect the rights of indigenous or local communities to obtain full access rights in terms of conducting consultations or negotiations related to the land compensation process.</p> <p>During audit can be shown evidence that all the information (maps, agreement, records, impact assessment, benefit sharing and legal arrangements) is available in appropriate forms and provide on Bahasa Indonesia.</p> <p>All of this information can be accessed and known by the affected parties including the transparency delivery of the value of compensation received. Some information related to the indemnity process that can be accessed:</p> <ul style="list-style-type: none"> - Land Map and coordinates - Minutes of Inventory of land, planting and building. - Declaration of Land Ownership/Ownership (SPPAT) - Declaration Letter of Land Transfer and Planting and Building. - Letter of Approval of Family/Heirs. 	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>In the process of acquiring land at PT KAL's plantation, the company involved a verification team consisting of 7 local villagers (Petinggi Kampung, Ketua Adat, BPK, and other community leaders).</p> <p>This is to respect the rights of indigenous or local communities to obtain full access rights in terms of conducting consultations or negotiations related to the land compensation process. Also to get their right to determine the agreement "agree" or "disagree".</p> <p>During audit can be shown evidence that all the information (maps, agreement, records, impact assessment, benefit sharing and legal</p>	Complied

		<p>arrangements) is available in appropriate forms and provide on Bahasa Indonesia.</p> <p>All of this information can be accessed and known by the affected parties including the transparency delivery of the value of compensation received. Some information related to the indemnity process that can be accessed:</p> <ul style="list-style-type: none"> - Land Map and coordinates - Minutes of Inventory of land, planting and building. - Declaration of Land Ownership/Ownership (SPPAT) - Declaration Letter of Land Transfer and Planting and Building. - Letter of Approval of Family/Heirs. 	
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p>	<p>PT Ketapang Agro Lestari has conducted a Social Environmental Impact Assessment (SEIA) study conducted in collaboration with the Faculty of Forestry, Bogotá Agricultural Institute in 2012. This SEIA assessment is carried out using a local community participation approach, includes:</p> <ul style="list-style-type: none"> - Field observations; to dig deeper information through direct observations in the field on various matters concerning socio-economic conditions in and around PT KAL. - Focus Group Discussion (FGD); conducted to dig up information on problems, desires, expectations and community acceptance of oil palm plantation development, FGDs were held in several villages, including: Kampung Kiaq, Kampung Tendiq, Penawang and Lendian Liang Nanyuq. The FGD was held on 3-4 February 2012 which was attended by 23 people. <p>From the results of the FGD, the following issues were identified:</p> <ul style="list-style-type: none"> - Lack of understanding of annual crop cultivation - Limited supply of clean water - The quality of education is still low. 	Complied

4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>In the process of acquiring land at PT KAL's plantation, the company involved a verification team consisting of 7 local villagers (Petinggi Kampung, Ketua Adat, BPK, and other community leaders).</p> <p>This is to respect the rights of indigenous or local communities to obtain full access rights in terms of conducting consultations or negotiations related to the land compensation process. Also to get their right to determine the agreement "agree" or "disagree".</p> <p>During audit can be shown evidence that all the information (maps, agreement, records, impact assessment, benefit sharing and legal arrangements) is available in appropriate forms and provide on Bahasa Indonesia.</p> <p>All of this information can be accessed and known by the affected parties including the transparency delivery of the value of compensation received. Some information related to the indemnity process that can be accessed:</p> <ul style="list-style-type: none"> - Land Map and coordinates - Minutes of Inventory of land, planting and building. - Declaration of Land Ownership/Ownership (SPPAT) - Declaration Letter of Land Transfer and Planting and Building. - Letter of Approval of Family/Heirs. 	Complied
4.5.6	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p>	<p>In the process of acquiring land at PT KAL's plantation, the company involved a verification team consisting of 7 local villagers (Petinggi Kampung, Ketua Adat, BPK, and other community leaders).</p> <p>This is to respect the rights of indigenous or local communities to obtain full access rights in terms of conducting consultations or negotiations related to the land compensation process. Also to get their right to determine the agreement "agree" or "disagree".</p>	Complied

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		<p>During audit can be shown evidence that all the information (maps, agreement, records, impact assessment, benefit sharing and legal arrangements) is available in appropriate forms and provide on Bahasa Indonesia.</p> <p>All of this information can be accessed and known by the affected parties including the transparency delivery of the value of compensation received. Some information related to the indemnity process that can be accessed:</p> <ul style="list-style-type: none"> - Land Map and coordinates - Minutes of Inventory of land, planting and building. - Declaration of Land Ownership/Ownership (SPPAT) - Declaration Letter of Land Transfer and Planting and Building. - Letter of Approval of Family/Heirs. <p>Based on an interview with the village head of Lendian that PT KAL through company representatives and representatives of the surrounding village community has agreed/approved of the development of an oil palm plantation managed by PT KAL.</p>	
4.5.7	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p>	<p>Based on the hectare statement, that PT KAL has been planting oil palm since 2012. The company can show the IUP document in the form of the Decree of the Regent of Kutai Barat Number: 525.26/K.941 a/2010 dated November 22, 2010 and has been updated with an increase in factory capacity in dated July 1, 2016 based on Letter No. 525/4117/BU dated July 1, 2016 concerning Technical Recommendations for an area of 9,271 Ha and a Mill capacity of 45 tons of FFB/hour to 90 tons of FFB/hour.</p> <p>Based on the Regulation of the Minister of Agriculture No. 98 of 2013 that Plantation Companies that apply for IUP-B or IUP with an area of 250 (two hundred fifty) hectares or more, are obliged to facilitate the</p>	Complied

		<p>development of community gardens with an area of at least 20% (twenty percent) of the IUP-B area. or IUP.</p> <p>PT KAL has fulfilled its obligation to facilitate community gardens covering an area of 1,474.3261 Ha or 20% of the HGU area of 7,340.01 Ha.</p> <p>In period 2010 – 2017 that the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process, with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation.</p>	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>Based on interviews with the Village Head (Petinggi) Lendian and community leaders, that there was no opening/construction of PT KAL's plantations which were obtained from areas inhabited by people who are isolating.</p> <p>In period 2010 – 2017 that the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process, with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation.</p>	Complied

Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	PT Ketapang Agro Lestari already has a mechanism or information management system, namely Communication Procedure No. FR.EMS.CIE. Rev.01 dated February 24, 2020. This procedure also describes the methods to assist the flow of information. Forms of information include requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions and consultations with the company. Procedures are provided in Indonesian so they can be understood by stakeholders and communities around the plantation. Compensation related to this unit of certification, please refer indicator 4.4.1 and 4.4.2 above.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	PT Ketapang Agro Lestari already has a mechanism or information management system, namely Communication Procedure No. FR.EMS.CIE. Rev.01 dated February 24, 2020. This procedure also describes the methods to assist the flow of information. Forms of information include requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions and consultations with the company. Procedures are provided in Indonesian so they can be understood by stakeholders and communities around the plantation. This procedure has been socialized to all stakeholders, based on "Berita Acara Stakeholder Meeting dan Sosialisasi RSPO" to the community and to plasma farmers on October 4, 2021, the material and event weight and attendance list can be shown at the time of the audit. Compensation related to this unit of certification, please refer indicator 4.4.1 and 4.4.2 above.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	This procedure has been socialized to all stakeholders, based on "Berita Acara Stakeholder Meeting dan Sosialisasi RSPO" to the community and to plasma farmers on October 4, 2021, the material and event weight and attendance list can be shown at the time of the audit.	Complied

		<p>Based on interviews with the Village Head (Petinggi) Lendian and community leaders that PT KAL provides opportunities for the entire surrounding community and does not discriminate between women and men to establish smallholder.</p> <p>In period 2010 – 2017 that the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process, with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation.</p> <p>Compensation related to this unit of certification, please refer indicator 4.4.1 and 4.4.2 above.</p>	
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p>	<p>This procedure has been socialized to all stakeholders, based on "Berita Acara Stakeholder Meeting dan Sosialisasi RSPO" to the community and to plasma farmers on October 4, 2021, the material and event weight and attendance list can be shown at the time of the audit.</p> <p>Based on interviews with the Village Head (Petinggi) Lendian and community leaders that PT KAL provides opportunities for the entire surrounding community and does not discriminate between women and men to establish smallholder.</p> <p>In period 2010 – 2017 that the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process, with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation.</p>	Complied

		Compensation related to this unit of certification, please refer indicator 4.4.1 and 4.4.2 above.	
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	<p>PT Ketapang Agro Lestari already has a mechanism or information management system, namely Communication Procedure No. FR.EMS.CIE. Rev.01 dated February 24, 2020. This procedure also describes the methods to assist the flow of information. Forms of information include requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions and consultations with the company. Procedures are provided in Indonesian so they can be understood by stakeholders and communities around the plantation.</p> <p>This procedure has been socialized to all stakeholders, based on "Berita Acara Stakeholder Meeting dan Sosialisasi RSPO" to the community and to plasma farmers on October 4, 2021, the material and event weight and attendance list can be shown at the time of the audit.</p> <p>Refer to 4.4.1 and 4.4.2 above for more details related to consent and compensation.</p>	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	<p>PT Ketapang Agro Lestari already has a mechanism or information management system, namely Communication Procedure No. FR.EMS.CIE. Rev.01 dated February 24, 2020. This procedure also describes the methods to assist the flow of information. Forms of information include requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions and consultations with the company. Procedures are provided in Indonesian so they can be understood by stakeholders and communities around the plantation.</p> <p>This procedure has been socialized to all stakeholders, based on "Berita Acara Stakeholder Meeting dan Sosialisasi RSPO" to the community and</p>	Complied

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		to plasma farmers on October 4, 2021, the material and event weight and attendance list can be shown at the time of the audit. Refer to 4.4.1 and 4.4.2 above for more details related to consent and compensation.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	PT Ketapang Agro Lestari already has a mechanism or information management system, namely Communication Procedure No. FR.EMS.CIE. Rev.01 dated February 24, 2020. This procedure also describes the methods to assist the flow of information. Forms of information include requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions and consultations with the company. Procedures are provided in Indonesian so they can be understood by stakeholders and communities around the plantation. This procedure has been socialized to all stakeholders, based on "Berita Acara Stakeholder Meeting dan Sosialisasi RSPO" to the community and to plasma farmers on October 4, 2021, the material and event weight and attendance list can be shown at the time of the audit. Refer to 4.4.1 and 4.4.2 above for more details related to consent and compensation.	Complied
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	In period 2010 – 2017 that the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process, with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation. Based on interviews with the Village Head (Petinggi) Lendian and community leaders that in the process of land tenure and payment of	Complied

		land compensation, there are no land conflicts or complaints from the surrounding community.	
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	In period 2010 – 2017 that the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process, with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation. Based on interviews with the Village Head (Petinggi) Lendian and community leaders that in the process of land tenure and payment of land compensation, there are no land conflicts or complaints from the surrounding community.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	In period 2010 – 2017 that the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process, with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation. Based on interviews with the Village Head (Petinggi) Lendian and community leaders that in the process of land tenure and payment of land compensation, there are no land conflicts or complaints from the surrounding community.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	In period 2010 – 2017 that the process of compensation for land contained in the land of the community or village head (Petinggi) it is called "Lendian customary land-lahan Adat Lendian". The process of land compensation for this land is carried out through the FPIC process,	Complied

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		<p>with the consent of the family and heirs, this is recorded in the form of a "Surat Persetujuan Keluarga/Ahli Waris - Letter of Approval for the Family/Heirs" and a Statement Letter from the land owner stating that they agree to be carried out for land compensation.</p> <p>Based on interviews with the Village Head (Petinggi) Lendian and community leaders that in the process of land tenure and payment of land compensation, there are no land conflicts or complaints from the surrounding community.</p>	
<p>Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	<p>Non-Conformance: Based on interview with the Head of KUD Plasma "Koperasi Serba Usaha Sempekak Penawang Lendian Sejahtera", it was known that prices for FFB has not available and accessible by smallholders.</p>	Non-compliance
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	<p>According to the interview with FFB Purchasing staff and document verification on FFB Purchasing Agreement obtained information that the FFB pricing based the general market of CPO. Buyer has the right to determine the applicable FFB price.</p> <p>FFB price updates are carried out by the FFB Purchasing Department directly to suppliers via telephone or messaging applications.</p>	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	<p>Based on the results of interviews with FFB suppliers and verification of FFB purchase agreement documents, information was obtained that FFB prices refer to the prevailing market price of CPO. In the agreement it is stated that the buyer has the right to set the applicable FFB price.</p> <p>FFB price updates are carried out by the FFB Purchasing Department directly to suppliers via telephone or messaging applications.</p>	Complied

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5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	Based on the results of interviews with FFB suppliers and verification of FFB purchase agreement documents, information was obtained that FFB prices refer to the prevailing market price of CPO. In the agreement it is stated that the buyer has the right to set the applicable FFB price.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>The agreement/contract documents between the company and the contractor is sighted such as for FFB supplier. The contract was acknowledged by both parties and well understood. The contract contained all relevant information such as payment method, work requirements, force majeure, contract period, cancellation of contract, etc.</p> <p>Based on document review, an agreement between company and local contractors confirmed that contract is made fairly, legal and transparent.</p> <ul style="list-style-type: none"> - PT. KAL & PT. Wong Akeh Utama have signed the Code of Procurement Ethics dated 30 June 2021. - PT. KAL & PT. Ketapang Hijau Lestari have signed the Code of Procurement Ethics dated 04 January 2021. - PT. KAL & PT. Marsam Citra Adiperkasa have signed the Code of Procurement Ethics dated 04 January 2021. 	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	<p>Evidence of payment is reviewed and interview with local contractor confirmed that payment for contractor timely manner.</p> <p>Sample seen on third party FFB suppliers: PT. KAL have paid for FFB's sourced from PT. Wong Akeh Utama, dated 4 October 2021 through bank transfer.</p>	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	According to the Indonesian regulation, verification of weigh bridge conducted annually. Sighted the record of validation from Cooperation and Trading Agency of Kutai Barat Regency as follows:	Complied

		<ul style="list-style-type: none"> Validation Certificate No: 510.63/0889/100.12.01 dated 22 June 2021 for weighbridge Presica PSC 8228-WMS, series 2805252, capacity 60 MT, brand Presica. Validation renewal before 12 June 2022. Validation Certificate No: 510.63/0813/100.12.01 dated 31 May 2021 for weighbridge Presica PSC 8228-WMS, series 2805133, capacity 60 MT, brand Presica. Validation renewal before 24 May 2022. 	
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	<p>Non Conformance:</p> <p>PT. Ketapang Agro Lestari has not prepared mutual agreement to support independent smallholder for certification.</p>	Non-compliance
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	<p>Grievance mechanism including from external stakeholder are documented in SOP of Communication (FR.EMS.CIE) dated 24 February 2020. Grievance or any kind of communication can be communicated through field staff or by email to sustainability@first-resources.com. The procedure stated that all communication or grievance will be responded in 1 month maximum.</p> <p>There was no complaint received since last surveillance assessment.</p>	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	<p>There is no evidence PT. Ketapang Agro Lestari has consulted smallholders (irrespective of type) to support and improve their livelihood and their interest in RSPO certification.</p> <p>Non Conformance:</p> <p>PT. Ketapang Agro Lestari has not consulted smallholders (irrespective of type) to support and improve their livelihood and their interest in RSPO certification.</p>	Non-compliance

5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	There is no evidence that unit of certification has not implemented livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). Non Conformance: PT. Ketapang Agro Lestari has not implemented livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	Non-compliance
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	There is no evidence that unit of certification has not provided support to smallholders to promote legality of FFB production. Non Conformance: PT. Ketapang Agro Lestari has not provided support to promote legality of FFB production.	Non-compliance
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	PT. Ketapang Agro Lestari has had scheme smallholders, for pesticides handling has been applied by Tim Unit Semprot (TUS) Team. The TUS Team has been given the training regarding pesticide handling on 29 June 2021.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Non Conformance: PT. Ketapang Agro Lestari has not performed regular review and public report on the progress of the smallholder support programme.	Non-compliance

Principle 6: respect workers' rights and conditions
Protect workers' rights and ensure safe and decent working conditions.

Criteria 6.1: Any form of discrimination is prohibited.

6.1.1	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>PT Ketapang Agro Lestari has established the Company Policy on Equal Opportunities as documented in "Surat Keputusan Direksi No: 011.A/SUSTAINABILITY_FR/P/VI/2012 Tentang Kebijakan Persamaan Kesempatan Kerja" – Equal Employment Opportunity Policy, dated 15 June 2012.</p> <p>The policy statement:</p> <ul style="list-style-type: none"> - First Resources and its subsidiaries will not discriminate against anyone in terms of recruitment or in the business activity. - Selection and hiring employment conducted based on qualification and experience. The candidate who is accepted is the one who best meets the requirements. - Promotion in company conducted the same way. <p>The policy has been communicated to all employee, evidence of policy communication are available and verified during audit. Based on interview with employee confirmed that there is no indication of discrimination in the workers treatment by company.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>During interview with workers and Labor union confirmed that there is no discrimination occurs in PT Ketapang Agro Lestari.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>Company has a SOP related to new employment recruitment according to "SOP Rekrutment Staff dan Non Staff PT Ketapang Agro Lestari". The</p>	Complied

		<p>company will accept new employee based on their capabilities and qualifications.</p> <p>There are two types of employees that are applied in PT Ketapang Agro Lestari, which are permanent employees (known as SKU-B and SKU-H) and daily workers (known as BHL/PHL). Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Based on interview with the HR Dept., that recruitment of employees is based on an analysis of workforce needs and within it has considered, the required competencies, experience and expertise required. For this reason, employee acceptance tests and interviews will be conducted. Employee assessments are always carried out annually as a basis for being able to promote positions or levels/groups which will affect to the monthly salary.</p> <p>Sample verified of recruitment at Mill and Estate on period 2020/2021 and promotion of permanent employee on Mill and Estate.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>PT KAL has a policy to prevent sexual harassment as per "Sexual Harassment Policy No: 011.C/SUSTAINABILITY_FR/P/VI/2012" dated 15 June 2012. The policies stated that: "Company Group committed to ensuring a harmonious and productive work environment for its employees Company recognizes that the work place should be free of sexual harassment. Sexual harassment is unwanted, unwelcome and offensive behavior and will not be tolerated under any circumstances". In addition company has a policy to protect the reproductive rights as per "Protection of Reproductive Rights policy No: 011.SUSTAINABILITY_FR/P/VI/2012" dated 15 June 2012. Stated that</p>	Complied

		<p>company committed to protecting the reproductive rights of employees and to provide medical services associated with reproductive health.</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The last pregnancy checks on 27 & 28 September 2021 for 20 Sprayer workers and 26 fertilizer workers.</p> <p>When in pregnancy checking there are confluence workers who stated "positive", then based on the company's policy above, the woman workers to be transferred to other work which not related to chemical application (spray or fertilizing). Pregnancy test is not not conducted as a discriminatory measure.</p> <p>Company has issued the circulate letter No: PH/SE/003/XI/2021 dated 2 September 2021 which stated that:</p> <ul style="list-style-type: none"> - Employee has a rights for maternity leave until birth for 3 month. - Breastfeeding woman allowed to have a time for breastfeeding in 1 hour. - Pregnant and breastfeeding woman are prohibited to working in chemical handling (pesticide, fertilizer, etc). - Company committed to pregnancy test for female workers with high risk (pesticide, fertilizer, hazardous waste handling) each 3 month. 	
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	<p>The company has formed a Gender Committee covering Estate and Mill which is chaired by Mrs Marda Datu Bua, based on Decree letter "Penunjukan Penanggungjawab Komite Gender Surat No: 002/KAL-KG/X/2021" dated 1 October 2021. Organisation structure of committee gender:</p>	Complied

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		<ul style="list-style-type: none"> - Chairman: Mrs Arda Datu Bua - Gender equality Coordinator: Mrs Hernawati - Counseling Coordinator: Novalia Sari Br Siahaan - Female right Coordinator: Ayu Novita Sari - Training Coordinator: Seriyani <p>Work Program of Gender Committee has been established including the issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> - Socialization/campagne on gender equality - Committee gender meeting - Committee gender meeting with labor union/bipartite. <p>Since the gender committee has just been established, the regular monthly gender committee meeting was planed on March 2022. Based on the interviews with Gender committee and workers including management, that during the period 2020-2021 there were no cases related to sexual harassment.</p>	
6.1.6	There is evidence of equal pay for the same work scope.	<p>PT Ketapang Agro Lestari has set wages based on the application of the minimum wage referring to the Governor's Decree No. 560/K.618/2020 dated November 25, 2020 regarding "Upah Minimum Kabupaten Kutai Barat Tahun 2021, IDR. 3,310,000/bulan".</p> <p>Meanwhile, the determination of wages based on volume units is determined based on the calculation of premiums and incentives, namely the Company also issued a Circular from the Director of Plantation No. 002/FR/I-2020/SE/PLANT dated January 21, 2020 regarding the Implementation of the Latest Premium on Harvest, Care and Transportation of FR Estate Areas as of January 1, 2020.</p>	Complied
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			

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<p>6.2.1</p>	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p>	<p>The application of the minimum wage refers to the Governor's Decree No. 560/K.618/2020 dated November 25, 2020 regarding the 2021 Kutai Barat Regency Minimum Wage, which is IDR 3,310,000/month.</p> <p>PT Ketapang Agro Lestari also issued several Circulars from HR related to the determination of wages for the 2021 period, including:</p> <ol style="list-style-type: none"> 1. Circular from the Director of Plantation No. FR/746/II-20/SE/HRD dated 1 February 2021 regarding employee's wages on period 2021. 2. Circular from the Director of Plantation No. 002/FR/I-2020/SE/PLANT dated January 21, 2020 regarding the Implementation of the Latest Premium on Harvest, Care and Transportation of FR's Plantation Area as of January 1, 2020. 3. Determination of overtime pay with the calculation: the wage for 1 hour of overtime is the 2021 UMSK divided by 173 (IDR 19,133 per hour). <p>The determination of the wages is determined in the Indonesian language and is in accordance with the statutory regulations: Governor's Decree no. 560/K.618/2020 on November 25, 2020.</p> <p>Workers contracts related to overtime/wages are in accordance with the Local Labor Law in accordance with the minimum wage, for working conditions (working hours, wages, leave, overtime pay, social security, medical allowance, works incident allowance, other benefits) is appropriate and has referred to the Peraturan Perusahaan/PP that has been approved by the Manpower Office and has compiled with the labor regulations. Peraturan Perusahaan period 2019-2021 has been approved by Manpower Office Kutai Barat Regency as per Letter Decree No. 568/2713/DTKT-BPTKHI/XII/2019 dated 10 December 2019 with register number: 25/PP-XII/2019.</p>	<p>Complied</p>
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6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>PT Ketapang Agro Lestari uses permanent workers consisting of 2 types, namely: KHT- karyawan harian tetap (permanent daily employees) and PBT- Pekerja Bulanan Tetap (Permanent Monthly Workers) which require a trial period of 3 months.</p> <p>Employment binding with employees by using a work contract in the form of Perjanjian Kerja Waktu Tidak Tertentu.</p> <p>Payment of wages at PT KAL is done by transferring the bank account of BPD Kaltim Kaltara to employees, the company will make payroll and salary slips before wages are transferred. Payroll and salary slips contain basic wages (according to applicable regulations), allowances, overtime, premiums and the amount of deductions (taxes and contributions BPJS Tech and Kes), the following are examples of salary slips received by employees:</p> <p>Example of KHT Payroll Slip for September 2021:</p> <ol style="list-style-type: none"> 1) Workers name Muh*** Za*** (KHT), NIK: #####013, position: security, wage components: Basic wage: IDR 3,310,000, over time: IDR 2,104,624, deductions; Tax of PPH21: IDR 42,468, Natura/rice pieces: IDR 135,000 and BPJS Tek & Kes dues: IDR 132,400. Net Wage IDR 5,414,624. 2) Workers name Eli***** E**, NIK: #####0787, position: fertilizer worker, wage components: basic wage: IDR 3,312,500, Premiums: IDR 1,501,185, deductions; tax of PPH21: IDR -, Natura/rice pieces: IDR 129,600 and BPJS Tek & Kes dues: IDR 265,200. Net wage IDR 4,419,085. 3) Worker name Yoh***** Mi***, NIK: #####0102, position: water treatment operator, wage component: basic wage: IDR 3,314,500, over time: IDR 2,241,598, deductions; tax of PPH21: IDR 12,391, Natura/rice pieces: IDR 135,000 dan BPJS Tek & Kes Dues: IDR 132,580. Net Wage IDR 5,276,127. 	Non-compliance
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		<p>Based on the verification of payroll documents and employee salary slips as well as interviews with several employees, that the application of wages at PT KAL has complied with the applicable laws and regulations (Governor's Decree No. 560/K.618/2020 dated November 25, 2020).</p> <p>Non conformity</p> <p>Based on the verification of the Perjanjian Kerja Waktu Tidak Tertentu (PKWTT) document at PT KAL there is a work contract:</p> <ol style="list-style-type: none"> 1) PKWTT Work agreement an AKAD employee has not been renewed in accordance with the Employee Recruitment procedure no. AD.PNK.HRD.R&S.0002.001 2) The Work Agreement has not been explained in detail regarding working hours, working days, overtime, the right to vacation and maternity leave in accordance with the laws and regulations.. <p>Objective evidence:</p> <ol style="list-style-type: none"> 1) Based on employee recruitment procedure No. AD.PNK.HRD.R&S.0002.001, that the AKAD work agreement will not be extended if its validity period has expired, but if the worker still wants to continue the working relationship with the company, a new work agreement letter with the status of Karyawan Harian Tetap will be issued (KHT). 2) Some workers are recruited using AKAD (Antar Kerja Antar Daerah) using an AKAD Work Agreement with a probationary period of 3 months and then after appointment an Perjanjian Kerja Waktu Tidak Tertentu is made. However, it has not been explained in detail related to working hours, working days, overtime, the right to vacation and maternity leave in accordance with statutory regulations. 	
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		<p>Example :</p> <ul style="list-style-type: none"> - Perjanjian Kerja Eaktu Tidak Tertentu No. 041/PKWTT/IV-2017 dated April 6, 2017 on behalf of Muhammad Nur Malik. - Perjanjian Kerja Waktu Tidak Tertentu No. 027/PKWTT/VII-2017 dated July 12, 2017 on behalf of employee Ester Sosa. 	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>PT KAL already has a Company Regulation-Peraturan Perusahaan (PP) for the period 2019-2021 which has been approved by the Manpower and Transmigration Office of West Kutai Regency SK No. 568/2713/DTK-BPTKHI/XII/2019 dated September 10, 2019. Based on the PT Company Regulations, it has been determined related to employment, as follows:</p> <ul style="list-style-type: none"> - CHAPTER IV; Article 17: Working Time: working time is determined according to the applicable provisions and regulations, namely 7 (seven) hours of work one day or 40 (forty) hours in 1 week and working days from Monday to Saturday. Rest time is 1 hour and is not counted as working time. - Article 18: Overtime work: overtime work is considered valid if there is a written overtime order from the leadership and is in accordance with the Company's Overtime SOP - Article 19: Wages; consisting of basic wages, allowances, BPJS contributions, deductions including income tax deductions. - CHAPTER IX, Article 31: Holidays; holidays recognized by the company are official holidays set by the government. - Article 32; Annual Leave: the employee's annual leave entitlement in the first year of work is calculated from the number of months starting to work until December. The amount of annual leave for 12 working days after working for 12 months continuously. - Article 33; Maternity/Miscarriage Leave: maternity leave is given to female employees who are pregnant for 1.5 months before giving birth and 1.5 months after giving birth with full salary payments. 	Complied

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		<ul style="list-style-type: none"> - Article 34; Permit to Leave Work: in accordance with applicable laws, employees can leave work or leave work permits while still receiving wages (P2) and not reducing the entitlement to annual leave for the following purposes: <ul style="list-style-type: none"> a) Self-employed married: 3 working days b) Employees marry off children: 2 working days c) Employees circumcising/baptizing children: 2 working days d) Wife gives birth/miscarriage: 2 working days e) Husband/wife, parent/in-law, child or daughter-in-law dies: 2 working days f) Family member in the same house dies: 1 working day. 	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>PT Ketapang Agro Lestari has provided facilities and infrastructure for the welfare of its employees, as follows:</p> <ul style="list-style-type: none"> - Permanent G4 employee housing: 37 units - G8 wooden barrack housing: 30 units - G10 wooden barrack housing: 43 units - Rain house: 5 units - Electricity: by using 2 units of generator - Irrigation/clean water: the provision of clean water from the PAPs in the factory is distributed to housing every day and the use of water reservoirs/ponds in the Rayon A Housing - Medical Center with paramedics consisting of 1 nurse and 1 midwife equipped with 1 ambulance unit - Child care: 5 units in each area - School: 1 unit of kindergarten, 1 unit of elementary school and 1 unit of junior high school - Employee cooperative: 1 unit 	Non-compliance

		<ul style="list-style-type: none"> - Places of worship: mosques 3 units and churches units - Children's playground: 1 unit - Sports field: volleyball court 3 units, dadminoto 2 units - 2 units of employee hall - Vegetable and fruit garden in 2 locations - Bus for school children transportation as much as 2 units <p>The company also provides an ambulance unit as part of the emergency response for employee health services. The supply of clean water for employees is sourced from the factory for the housing of Rayon A and Rayon B.</p> <p>The company has made plans to renovate employee housing (wooden G10 house) into permanent employee housing (G4). The budget has been set for the 2019-2020 period of Rp.... The realization of the construction of permanent G8 employee housing until June 2020 is 9 units of G4 permanent housing.</p> <p>Non conformity</p> <p>The company has not carried out laboratory checks on the quality standards of clean water used by PT KAL employees</p> <p>Objective evidence:</p> <p>The company provides clean water facilities to employees from WTP at the PKS, the clean water is used by employees for MCK (Mandi Cuci Kakus) activities or not for consumption, but it has not been proven that the clean water source has been carried out laboratory analysis according Permenkes No. 32 Tahun 2017 concerning standar mutu kesehatan lingkungan dan persyaratan kesehatan air untuk keperluan hygiene sanitasi, kolam renang, <i>slus per aqua</i> dan pemandian umum.</p>	
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		<p>Pasal 2;</p> <p>“(1) Setiap Penyelenggara wajib menjamin kualitas Air untuk Keperluan Higiene Sanitasi, air untuk Kolam Renang, air untuk SPA, dan air untuk Pemandian Umum, yang memenuhi Standar Baku Mutu Kesehatan Lingkungan dan Persyaratan Kesehatan.”</p>	
6.2.5	The unit of certification makes efforts to improve workers’ access to adequate, sufficient and affordable food.	<p>PT KAL has provided access to employees regarding adequate and affordable food, including the Employee Cooperative which provides basic necessities.</p> <p>The location of PT KAL's plantation is 5 km from the Lendian Village traditional market with good road access so that it is easily accessible by employees. The company also welcomes vegetable and fruit sellers to enter PT KAL's plantation area every day.</p>	Complied
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	PT Ketapang Agro Lestari has calculated the Prevailing Wage for the 2021 period, as follows:	Complied

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No.	Components	Parametres	Monthly Cost (IDR/Month)
A	In Kind Benefit		
1	Tunjangan makan	Tunjangan beras	Include in UMSK
2	Tunjangan perumahan	Pembangunan rumah (toal biaya bigagi 30 thn)	IDR 20.302
		Biaya maintenance perumahan (dibagi jumlah rumah)	IDR 83.333
3	Bonus karyawan	Tunjangan hari raya	IDR 251.667
		Bonus tahunan	IDR 503.333
4	Tunjangan pendidikan	Biaya perawatan sekolah (sarpras, listrik dan air)	IDR 13.825
		Biaya BBM bus angkutan anak sekolah	IDR 7.988
		Biaya perawan bus sekolah	IDR 6.912
		Honor guru	IDR 55.300
		Bangunan sekolah (masa pakai 30 tahun)	IDR 6.554
5	Housing facilities	Biaya Instalasi listrik	IDR 14.350
		Biaya Aliran Listrik	IDR 193.913
		Biaya pemakaian air	IDR 30.795
6	Pelayanan Kesehatan	Pembelian obat-obatan	IDR 9.025
		Honor Dokter	belum ada
		Honor perawat	IDR 17.281
		Bangunan klinik (masa pakai 30 tahun)	IDR 3.674
		Perawatan Klinik	IDR 17.281
7	Tempat Penitipan Anak	Pembangunan tempat penitipan anak (masa pakai 30 tahun)	IDR 2.535
		Perawatan bangunan	IDR 8.504
		Gaji pengasuh	IDR 13.917
8	Hiburan	Perawatan lapangan bola	belum ada
		Perawatan lapangan badminton	IDR 2.688
		Perawatan lapangan volley	IDR 1.920
			IDR 1.265.097
B	Upah pekerja (UMSK 202	Upah dalam sebulan (SK Gubernur No. 560/K.618/2020 tanggal 25 November 2020)	IDR 3.310.000
Total value of Prevailling Wage (A+B)			IDR 4.575.097

Based on the DLW calculation above, it shows that the fulfilment of the needs of employees at PT KAL until the period of September 2021 has been fulfilled. And when compared with the minimum wage for Kutai Barat Regency for the 2021 period, that PT KAL has provided the living needs of employees has exceeded the calculation of the UMSK Kutai Barat Regency 2021 period.

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	<p>Based on document verification, field observation and interview with several workers, that all employees at PT Ketapang Agro Lestari is as permanent worker called PBT (Pekerja Bulanan Tetap/Permanent Monthly Workers) and KHT (Karyawan Harian Tetap/Permanent Daily Workers). Permanent workers are divided into 2 (two) parts, namely PBT and KHT aimed at differentiating the level of position and work in the company's operational scope, and also as classification in the structure and scale of wages for workers. This classifications is in accordance with the Table of Position and Group Structure in 2021 First Resources Group Region Kalimantan Timur</p> <p>Up to September 2021 the number of employees at PT KAL as follow:</p> <table border="1" data-bbox="1131 742 1809 941"> <thead> <tr> <th>Grade/Status</th> <th>Mill/PKS</th> <th>Estate</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>PBT</td> <td>4</td> <td>29</td> <td>33</td> </tr> <tr> <td>KHT</td> <td>71</td> <td>935</td> <td>1,006</td> </tr> <tr> <td>Total</td> <td>75</td> <td>964</td> <td>1,039</td> </tr> </tbody> </table>	Grade/Status	Mill/PKS	Estate	Total	PBT	4	29	33	KHT	71	935	1,006	Total	75	964	1,039	Complied
Grade/Status	Mill/PKS	Estate	Total																
PBT	4	29	33																
KHT	71	935	1,006																
Total	75	964	1,039																
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>																			
6.3.1	(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.	PT Ketapang Agro Lestari has a published statement recognizing freedom of association and right to collective bargaining as per "Surat Edaran Nomor: PH/SE/00/XI/2020 dated 19 November 2020. The policy stated at point 2 "Perusahaan menjamin kebebasan karyawan dalam berserikat dan menyampaikan pendapat yang sesuai dengan aturan hukum yang berlaku di Indonesia" –The company guarantees the freedom of employees to associate and express opinions in accordance with the applicable laws in Indonesia.	Complied																

		<p>The policy has been communicated to all workers through master morning and meeting. Sample seen for socialization evidence available in "Laporan Pelatihan/Sosialisasi" dated 6 October 2021.</p> <p>During interview with workers and LKS bipartite confirmed that they have aware and understand regarding the policy and their right or freedom to express their opinion and made the association or to collective bargaining.</p> <p>There is no union labour formed in PT Ketapang Agro Lestari, however there are organisation of LKS Bipartite which is the communication forum representing the all employee in Pt Ketapang Agro Lestari. LKS Bipartite has been registered in Manpower office of Kutai Barat Regency as per "Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi kabupaten Kutai Barat Nomor: 568/2236/DTKT-BPTKHI/IX/2019 Tentang pencatatan Lembaga Kerjasama Bipartit PT Ketapang Agro Lestari" dated 27 September 2019. Tanda Bukti Pencatatan LKS Bipartit Nomor: 568/2237/DTKT-BPTKHI/IX/2019 dated 27 September 2019.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p>	<p>There is no union labour formed in PT Ketapang Agro Lestari, however there are organisation of LKS Bipartite which is the communication forum representing the all employee in Pt Ketapang Agro Lestari. LKS Bipartite has been registered in Manpower office of Kutai Barat Regency as per "Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi kabupaten Kutai Barat Nomor: 568/2236/DTKT-BPTKHI/IX/2019 Tentang pencatatan Lembaga Kerjasama Bipartit PT Ketapang Agro Lestari" dated 27 September 2019. Tanda Bukti Pencatatan LKS Bipartit Nomor: 568/2237/DTKT-BPTKHI/IX/2019 dated 27 September 2019.</p> <p>Regular meeting has been programme to discuss about the issue regarding employment and the update of employment regulation.</p> <p>Sample of LKS Bipartite meeting on 8 December 2020 discussing the socialization of employment policy. For Y2021 LKS Bipartite meeting has</p>	Complied

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		<p>been conducted on 29 September 2021 regarding welfare amenities, clinic service, and road dust control during dry season.</p> <p>Attendance list and minutes of meeting are available and verified during audit.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p>	<p>PT Ketapang Agro Lestari has shown the organisation of LKS Bipartite, the organisation structure are as below:</p> <ul style="list-style-type: none"> - Chairman: Bima Sakti Nugroho (GM) - Secretary: Chandra Mendrofa (Mandor Sipil) - Member: Satria Perdana Tarigan (Mill manager), Deni Jaelani (KTU), Desto Hia (Head Assistant Rayon A), Anton Ginting (Mandor Compound), Iwan Flantino Nababan (Head Assisstant Rayon B), Risaldus (Harvesting supervisor/mandore). <p>Nonconformity found during audit:</p> <p>According to the organisation of labour organization (LKS Bipartite) noted that organization member consist of 5 person representative of Company management and 3 person representative of workers/labour. According to the requirement or provision from Manpower Office of Kutai Barat Regency stated that LKS Bipartite should be 1 : 1 between Management and workers.</p> <p>Company has taken action by develop the corrective action plan; Audit team has accepted the CAP. The effectiveness of implementation will be verified in the next surveillance assessment.</p>	Non-compliance
Criteria 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p>	<p>PT KAL has had company policy regarding protection of children, including prohibition of child labour record as Kebijakan No. 011.B/SUSTANIABILITY_FR/P/VI/2012 dated 15 June 2015 regarding Child Labor Policy that the company committed to does not employ children under the age of 18 years.</p>	Complied

		<p>This policy has been socialized to all employees of PT Ketapang Agro Lestari on 23-24 January 2020 and on 08 December 2020 and also on 4 October 2021.</p> <p>This policy has also been conveyed to all third parties (Contractors) who cooperate with PT Ketapang Agro Lestari through direct meetings when signing the cooperation contract. Furthermore, the Contractor also makes a statement through the Company's Commitment Letter-Surat Komitment Perusahaan, which contains related commitments: the use of PPE, the prohibition of disposing of B3 waste, labor protection (including the prohibition on the use of child labor and underage) and compliance with law and human rights including the application of ethical behaviour.</p> <p>Example of contract:</p> <ul style="list-style-type: none"> - CPO Transport Agreement Letter No. KAL/078/SPJP/XII-20/DIR dated December 31, 2020 on behalf of PT Jaya Harapan Nusa Sejahtera (namely Johan Arifin); PT Jaya Harapan Nusa Sejahtera's Letter of Commitment dated April 11, 2021. - Kernel Transportation Agreement Letter-Surat Perjanjian Pengangkutan Palm Kernel No. KAL/016/SPJP/I-21/DIR dated 4 January 2021 on behalf of CV Inti Jaya (namely: Riki Anggara); CV Inti Jaya's Letter of Commitment dated 7 April 2021. - Palm Oil FFB Sale and Purchase Agreement No. MCA/001/JBTS/I/2021 dated January 4, 2021, on behalf of PT Marsam Citra Adi Perkasa, has stated a commitment related to the code of business ethics "Letter of Commitment to PT Marsam Citra Adiperkasa" on May 1, 2021. - Palm Oil FFB Sale and Purchase Agreement No. BSMJ/010/JBTS/I/2021 dated January 4, 2021, on behalf of PT Borneosurya Mining Jaya, has stated a commitment related to the 	
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		code of business ethics "Letter of Commitment to PT Marsam Citra Adiperkasa" on April 1, 2021.	
6.4.2	<p>(C) Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p>PT KAL has had company policy regarding protection of children, including prohibition of child labour record as Kebijakan No. 011.B/SUSTANIABILITY_FR/P/VI/2012 dated 15 June 2015 regarding Child Laour Policy that the company commit to does not employ children under the age of 18 years.</p> <p>This policy has been socialized to all employees of PT Ketapang Agro Lestari on 23-24 January 2020 and on 08 December 2020 and also on 4 October 2021.</p> <p>This policy has also been conveyed to all third parties (Contractors) who cooperate with PT Ketapang Agro Lestari through direct meetings when signing the cooperation contract. Furthermore, the Contractor also makes a statement through the Company's Commitment Letter-Surat Komitment Perusahaan, which contains related commitments: the use of PPE, the prohibition of disposing of B3 waste, labor protection (including the prohibition on the use of child labor and underage) and compliance with law and human rights including the application of ethical behaviour.</p> <p>Example of contract:</p> <ul style="list-style-type: none"> - CPO Transport Agreement Letter No. KAL/078/SPJP/XII-20/DIR dated December 31, 2020 on behalf of PT Jaya Harapan Nusa Sejahtera (namely Johan Arifin); PT Jaya Harapan Nusa Sejahtera's Letter of Commitment dated April 11, 2021. - Kernel Transportation aAgreement Letter-Surat Perjanjian Pengangkutan Palm Kernel No. KAL/016/SPJP/I-21/DIR dated 4 January 2021 on behalf of CV Inti Jaya (namely: Riki Anggara); CV Inti Jaya’s Letter of Commitment dated 7 April 2021. - Palm Oil FFB Sale and Purchase Agreement No. MCA/001/ JBTS/I/2021 dated January 4, 2021, on behalf of PT 	Complied

		<p>Marsam Citra Adi Perkasa, has stated a commitment related to the code of business ethics "Letter of Commitment to PT Marsam Citra Adiperkasa" on May 1, 2021.</p> <ul style="list-style-type: none"> - Palm Oil FFB Sale and Purchase Agreement No. BSMJ/010/JBTS/I/2021 dated January 4, 2021, on behalf of PT Borneosurya Mining Jaya, has stated a commitment related to the code of business ethics "Letter of Commitment to PT Marsam Citra Adiperkasa" on April 1, 2021. 	
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	<p>As explained in indicator 6.4.1, the company has a policy regarding protection of children, including prohibition of child labour record as Kebijakan No. 011.B/SUSTANIABILITY_FR/P/VI/2012 dated 15 June 2015 regarding Child Laour Policy that the company commit to does not employ children under the age of 18 years.</p> <p>Based on verification of worker documents for period September 2021 in each Estate and Mill, there are no workers who are less than 18 years of age when hired as workers.</p>	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>PT KAL has had company policy regarding protection of children, including prohibition of child labour record as Kebijakan No. 011.B/SUSTANIABILITY_FR/P/VI/2012 dated 15 June 2015 regarding Child Labour Policy that the company commit to does not employ children under the age of 18 years.</p> <p>This policy has been socialized to all employees of PT Ketapang Agro Lestari on 23-24 January 2020 and on 08 December 2020 and also on 4 October 2021.</p> <p>This policy has also been conveyed to all third parties (Contractors) who cooperate with PT Ketapang Agro Lestari through direct meetings when signing the cooperation contract. Furthermore, the Contractor also makes a statement through the Company's Commitment Letter-Surat Komitment Perusahaan, which contains related commitments: the use of PPE, the prohibition of disposing of B3 waste, labor protection</p>	Complied

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		<p>(including the prohibition on the use of child labor and underage) and compliance with law and human rights including the application of ethical behaviour.</p> <p>Example of contract:</p> <ul style="list-style-type: none"> - CPO Transport Agreement Letter No. KAL/078/SPJP/XII-20/DIR dated December 31, 2020 on behalf of PT Jaya Harapan Nusa Sejahtera (namely Johan Arifin); PT Jaya Harapan Nusa Sejahtera's Letter of Commitment dated April 11, 2021. - Kernel Transportation Agreement Letter-Surat Perjanjian Pengangkutan Palm Kernel No. KAL/016/SPJP/I-21/DIR dated 4 January 2021 on behalf of CV Inti Jaya (namely: Riki Anggara); CV Inti Jaya's Letter of Commitment dated 7 April 2021. - Palm Oil FFB Sale and Purchase Agreement No. MCA/001/JBTS/I/2021 dated January 4, 2021, on behalf of PT Marsam Citra Adi Perkasa, has stated a commitment related to the code of business ethics "Letter of Commitment to PT Marsam Citra Adiperkasa" on May 1, 2021. - Palm Oil FFB Sale and Purchase Agreement No. BSMJ/010/JBTS/I/2021 dated January 4, 2021, on behalf of PT Borneosurya Mining Jaya, has stated a commitment related to the code of business ethics "Letter of Commitment to PT Marsam Citra Adiperkasa" on April 1, 2021. 	
<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p>	<p>A policy to prevent sexual and all other form of harassment and violence are available in Decree of the Board No: 011.C/SUSTAINABILITY_FR/P/VI/2012 regarding Sexual Harassment Policy" dated 15 June 2012, signed by CEO. Stated in the Policy that First Resources support the strict enforcement of law. Each sexual</p>	<p>Complied</p>

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		<p>harassment report will handle properly and confidentially to get a fair statement and can reduce the risk of harm.</p> <p>The policy has been communicated to all workers through master morning and meeting. Sample seen for socialization evidence available in "Laporan Pelatihan/Sosialisasi" dated 6 October 2021.</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>A policy to protect the reproductive rights of all, especially of women are available in Decree of the Board No: 011.D/SUSTAINABILITY_FR/P/VI/2012 regarding Protection of Reproductive Rights Policy" dated 15 June 2012, signed by CEO.</p> <p>The policy has been communicated to workers through master morning and meeting. Sample seen for socialization evidence available in "Laporan Pelatihan/Sosialisasi" dated 6 October 2021.</p> <p>Nonconformity found during audit:</p> <p>A policy to protect the reproductive rights of all, especially of women are available in Decree of the Board No: 011.D/SUSTAINABILITY_FR/P/VI/2012 regarding Protection of Reproductive Rights Policy" dated 15 June 2012, signed by CEO.</p> <p>However there is no evidence that the policy has been communicated to all level of the workforce.</p> <p>During interview with female fertilizer workers confirmed that they don't aware/understand about a policy to protect the reproductive rights.</p>	Non-compliance
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p>	<p>PT KAL has assessed the needs of new mother in consultation with the new mother as per "Identifikasi Kebutuhan Ibu Baru di PT KAL" year 2021.</p> <p>Non conformity found during audit:</p> <p>However Based on interview with female fertilizing workers, confirmed that they are not aware about the circular letter that company provide time for breastfeeding.</p>	Non-compliance

		<p>During filed visit and interview with fertilizing workers (YL), she still working as a fertilizing worker when she was in breastfeeding for her child with age 3 month.</p> <p>Based on new mother identification report shown that most of respondent not from new mother (only 8 new mother respondent and the rest is not new mother 62 person)</p>	
<p>6.5.4</p>	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT Ketapang Agro Lestari has established the Procedure of Communication SOP FR.EMS.CIE, Rev.2 dated 22 November 2020. The procedure are explain a grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information.</p> <p>Point 3.11 stated that every complaint an grievance receive by estate (local) or regional office, company will response to the complainant (stakeholders) as per Flowchart Social Issue Handling FR.EMS.CIE-1/1-0/01-08-2011.</p> <p>Whistle blowing and anonymity was stipulated in point 3.14.</p> <p>3.14.3 The company management will guarantee the anonymity of the whistleblower/whistleblower including confidentiality, safety, reputation and good name for every Stakeholder who submits confidential information to the company.</p> <p>Non conformity found during audit:</p> <p>There is no evidence that the policy has not been communicated to all levels of workforce.</p> <p>During interview with workers confirmed that they have not understand and aware regarding the policy and grievance mechanism which was respects anonymity and protects complainants where requested.</p> <p>Company has taken action by develop the corrective action plan; Audit team has accepted the CAP. The effectiveness of implementation will be verified in the next surveillance assessment.</p>	<p>Non-compliance</p>

Criteria 6.6: No forms of forced or trafficked labour are used.																			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports; Payment of recruitment fees; Contract substitution without worker’s consent Involuntary overtime; Lack of freedom of workers to resign Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement Debt bondage Withholding of wages 	<p>PT KAL has a policy related to Zero Fraud Tolerance Policy No. FR.CIA.ZFT.001 dated 28 December 2012, and Recruitment Procedure No. AD.PNK.HRD.R&S.002.001 that PT KAL prohibits the existence of forms of Retention of identity documents, Payment of recruitment fees, Contract substitution without worker’s consent, Involuntary overtime, Lack of freedom of workers to resign, Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement, Debt bondage</p> <p>Based on the interview with workers as well as the officers of the LKS Bipartit stated that there was no indication companies to do practices related to prohibition in accordance with company policy.</p>	Complied																
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>Based on the verification of the work list document for the September 2021 period, employee work agreements and interviews with several employees during the audit, that PT KAL does not use workers with PKWT status or temporary/daily workers.</p> <p>Employment in PT Ketapang Agro Lestari is as permanent worker called PBT (Pekerja Bulanan Tetap) and KHT (Karyawan Harian Tetap). Up to September 2021 the number of employees at PT KAL as follow:</p> <table border="1" data-bbox="1131 1098 1807 1299"> <thead> <tr> <th>Grade/Status</th> <th>Mill/PKS</th> <th>Estate</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>PBT</td> <td>4</td> <td>29</td> <td>33</td> </tr> <tr> <td>KHT</td> <td>71</td> <td>935</td> <td>1006</td> </tr> <tr> <td>Total</td> <td>75</td> <td>964</td> <td>1039</td> </tr> </tbody> </table>	Grade/Status	Mill/PKS	Estate	Total	PBT	4	29	33	KHT	71	935	1006	Total	75	964	1039	Not Applicable
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PBT	4	29	33																
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Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.																			

<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Ketapang Agro Lestari has identify the responsible person for Health and Safety namely Ahli K3 Umum (OHS Expert) on behalf Galih Nurchary Adhji. The responsible person has been trained as OHS expert and obtained the Certificate No: Ser.18.1036/AK3/U/II/2019 dated 22 February 2019.</p> <p>OHS expert Appointment letter from Ministry of Manpower According to "Keputusan Menteri Ketenagakerjaan RI Nomor: KEP.1043/NKER-BINWASK3/II/2019 Tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum" dated 22 February 2019, valid for 3 years.</p> <p>PT Ketapang Agro Lestari has formed the Safety Committee (P2K3) which has been registered and approved by Manpower and Transmigration Office Kalimantan Timur Province as per "Keputusan Kepala Dinas tenaga Kerja dan Transmigrasi Provinsi Kalimantan Timur Nomor: KEP.566/2183/P2K3/PPK/DTKT/2021 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Ketapang Agro Lestari" dated 27 September 2021". Safety Committee Organisation Structure consist of:</p> <ul style="list-style-type: none"> - Chairman: Ketut Rinaldy - Vice Chairman 1: Bima Sakti - Vice Chairman 2: Satria Perdana Tarigan - Secretary: Galih Nurchary Adhji - Vice Secretary: Deni Jailani - Member: Desto Hia, Iwan F Nanbaban, Michael Kopong, Amiruddin Lubis, Armindo Sitorus, Leonardo Siahaan, Pardomuan Hutahean, Mitra Joy Tarigan, Henry Silaen, Yudi Sinaga. <p>Safety committee organisation has a responsibility to arrange the OHS work programme and monitor its implementation and ensure the OHS Management performance well maintained.</p>	<p>Complied</p>
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<p>6.7.2</p>	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT KAL has established documented procedures related to accident and emergency procedure in local language Bahasa Indonesia:</p> <ul style="list-style-type: none"> - SOP Emergency and Responsibility FR.EMS.ERS dated 1 September 2011 - SOP Handling of Emergency Accident and Nearmiss FR.OSPH.P12 dated 1 September 2011 <p>According to the emergency procedure, the emergency conditions have been identified including: working accident, Fire, explosion at buildings, chemical spill and poisonings also armed interference or ambush. The procedures described the roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health center, the emergency contact number of each internal emergency team and external related parties such as public fire station at local area Kabupaten Kutai Barat and Public health center were also available.</p> <p>Company has formed the emergency response team as per "Satuan Tugas Pengendalian kebakaran Lahan dan Kebun & Kesiapsiagaan Tanggap Darurat". Emergency response team has conducted the regular training and drill to response the emergency situation, sample seen: Basic Fire training and drill on 6 October, 21 November and 23 November 2020 in Estate, Office and Mill. Evidence of emergency drill can be demonstrated during audit including Scenario and minutes of emergency drill.</p> <p>PT Ketapang Agro Lestari has appointed the licensed Fire OHS Expert namely Suprayetno. He has Appointment letter as Fire OHS expert from Departemen Tenaga Kerja dan Transmigrasi RI Nomor: KEP.493/DJPPK-PPK/IX/05 tanggal 6 September 2005. He has been trained and certify as per Certificate from Depnakertrans RI Dirjen Pembinaan Pengawasan ketenagakerjaan No: Ser.07-B/PKK/03.04 tanggal 23 Maret 2004.</p>	<p>Non-compliance</p>
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		<p>There is no first aid training has been conducted for Field Foreman both in estate and mill. Company has socialized first aid equipment usage to the field foreman on 7 June 2021 (8 participants).</p> <p>First aid equipment are available in the worksite both in Estate and Mill. Sample seen:</p> <ul style="list-style-type: none"> - At field, brought by field foreman: 7 box. - At mill and estate 13 box, covering: estate office, mill office, warehouse office, workshop, Rayon office, fertilizer warehouse, sortation station, hazardous waste storage, laboratorium. <p>Record of accident are available in "Monitoring Kecelakaan Kerja" PT Ketapang Agro Lestari 2021. Report of accident period January – December 2020 are available. Each accident case were followed up by investigation as record in "PT KAL Accident Report" wich explain the detail of accident case and chronology.</p> <p>Accident report are review in regular basis each month through P2K3 meeting. Record of P2K3 meeting can be demonstrated during audit, sample seen: P2K3 meeting dated 29/07/2021, 29/08/2021, 29/09/2021 discussing the OHS programme implementation, accident report, and other issue related to OHS.</p> <p>Nonconformity found during audit:</p> <p>There is no assigned operatives trained in first aid are present in both field and other operations.</p> <p>Company has taken action by develop the corrective action plan; Audit team has accepted the CAP. The effectiveness of implementation will be verified in the next surveillance assessment.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those</p>	<p>PT Ketapang Agro Lestari has demonstrated the record of realization the OHS program 2020/2021 including use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as</p>	Non-compliance

	<p>applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>pesticides application, machine operations, land preparation, and harvesting. Evidence of PPE provision can be shown as per "Berita Acara serah terima Alat pelindung Diri". Sample seen: "Berita Acara serah terima Alat Pelindung Diri" dated 8 – 16 March 2021; PPE provision for warehouse workers (safety helmet, safety goggles, handgloves, apron, safety boots, masker), harvester (safety helmet, safety goggles, handgloves, apron, safety boots, masker, sickle cover), spraying workers (safety helmet, safety goggles, handgloves, apron, safety boots, masker) and fertilizer workers (safety helmet, safety goggles, handgloves, apron, safety boots, masker).</p> <p>Company has provide sanitation facilities for spraying operator, so that workers can change out of PPE, wash and put on their personal clothing. Sanitation facilities provide in area of Agrochemical warehouse with separate place.</p> <p>Based on field visit to house of agrochemical mixing and PPE wash/laundry and storage can be demonstrated that sanitation facilities are well function and sufficient for spraying workers.</p> <p>Nonconformity found during audit:</p> <p>During field visit to the spraying activity at block B74 found that Driver TUS only use face mask and not chemical mask. In addition at Afdeling IV Block B51 found 2 spraying workers was not wear masker, hand gloves and apron.</p> <p>During field visit to KAL POM found that welder is not wearing the PPE hand gloves during welding at Press Station.</p>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p>	<p>All workers have been provided with medical care and accident insurance (BPJS Ketenagakerjaan & BPJS Kesehatan).</p> <p>The insurances were still valid as seen by the recent slip payment in January – September 2021 for estate and mill.</p>	Complied

		<p>Several insurance payments are reviewed and are in accordance with the number of workers. For example, auditor has verified the BPJS Ketenagakerjaan (Accident and pension insurance) and BPJS Kesehatan receipt of payments period of August 2021 for total of 75 workers from Mill and 964 workers from Estate.</p> <p>Based on interview with sampled worker during the field visit in estate and mill, the affected workers received appropriate medical treatment from the insurance policy.</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT KAL has record Occupational injuries using Lost Time Accident (LTA) metrics. Report of injuries present in "Monitoring Kecelakaan Kerja Bulanan Tahun 2021". According to accident report, since January – September 2021 shown the record as below:</p> <ul style="list-style-type: none"> - Total Accident case (first aid category): 33 case - Total Lost Time injury: 0 - Accident frequency rate: 0.80 - Accident severity rate: 0 <p>There is no major or fatality accident that causing lost time injury.</p>	Complied
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<p>PT Ketapang Agro Lestari demonstrated procedure Operational Best Practices Pengendalian Gulma (MN.FR.COP.OPA.PGL) dated 1 July 2012. The manual explains policy on weed control, type and classification of weed, guideline for spraying (herbicide used, active ingredients, dosage, target species, spraying tools and nozzle), spraying techniques.</p> <p>Operational Best Practices Pengendalian Hama dan Penyakit (MN.FR.COP.OPA.PHT) dated 1 July 2012. The policy for pest and disease management is to have early warning system through census and infestation identification. The procedure explains the type oil palm</p>	Complied

		<p>pest such as leaf eating caterpillar, rodent attack, <i>Oryctes</i>, <i>Tirathaba</i>, termite. <i>Tyto alba</i> (barn owl), <i>Turnera</i>, <i>Antigonon</i> are the biological species to control the pest and part of integrated pest management. This species is bred by estate to reduce the pests.</p> <p>Sample of pest monitoring record verified:</p> <ul style="list-style-type: none"> - Rat Census as per Form AD.FR.COP.OPA.PHT.04 in KAL Estate Rayon A - Afd. 02, on 26 August 2021, Census Tim : Hasim/Junadi, at Blok C33, C32, C34, C35, C36, A31, C40, C41, C42 and C38. Total attack 0,4%. - Pest census of Ulat Pemakan Daun Kelapa Sawit (UPDKS), as per Form AD.FR.COP.OPA.PHT.02 in Kebun KAL Rayon A – Afd. 02, on 24 August 2021, Census Tim: Hasim/JUnadi, at Blok C33, C32, C34, C35, C36, A31, C40, C41, C42 and C38. Attack: <i>Ulat Api</i> 0,64%, <i>Ulat bulu</i> 0,5% dan <i>Ulat kantong</i> 0,3%. <p>Based on document verification, IPM plan are implemented and monitored to ensure effective weeds, pest and disease control.</p>	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	The company has identified type of invasive species that appears in estate operational areas, as per PermenLHK No.94/2016. Based on the evaluation, the invasive species identified namely <i>Turnera subulate</i> , it is a species developed as a beneficial plant in a plantation as host for natural predator of leaf eater caterpillar.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on document review and interview with the management it was known that the unit of certification did not use of fire for pest control.	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	PT. Ketapang Agro Lestari refers to Operational Best Practices Manual Oil Palm Agronomy – Pengendalian Hama dan Penyakit No.FR.COP.OPA.PHT. Section 6.7.5 Economic threshold or leaf eating caterpillar: <i>Setothosea asigna</i> 5/frond; <i>Setora nitens</i> 5/frond; Darna	Complied

		<p>trima 10/frond; <i>Ploneta diducta</i> 10/frond; <i>Mahasena corbetti</i> 5/frond; <i>Metisa plana</i> 10/frond.</p> <p>Section 6.7.6 Control</p> <ul style="list-style-type: none"> - Manual: handpicking, cocoon picking, light trap. - Biological control: bio-insecticide through <i>Bacillus thuringensis</i>, virus or fungi, conservation and exploitation of natural predator, use of beneficial plant. - Chemical control: spraying/fogging chemical insecticide, trunk injection, root infuse. <p>Section 6.7.6.7 Contact insecticide</p> <table border="1" data-bbox="1131 730 1973 1058"> <thead> <tr> <th>Pest</th> <th>Active ingredient</th> <th>Dosage per Ha</th> </tr> </thead> <tbody> <tr> <td>Setothosea asigna</td> <td>Deltametrin</td> <td>200 ml</td> </tr> <tr> <td>Setora nitens</td> <td>Lamda Sihalotrin</td> <td>200 ml</td> </tr> <tr> <td>Darna trima</td> <td>Betasiflutrin</td> <td>225 ml</td> </tr> <tr> <td>Ploneta diducta</td> <td>Sipermetrin</td> <td>300 ml</td> </tr> <tr> <td>Mahasena corbeti</td> <td rowspan="2">Asefat</td> <td rowspan="2">650 ml</td> </tr> <tr> <td>Metisa plana</td> </tr> </tbody> </table> <p>PT. Ketapang Agro Lestari refers to Operational Best Practices Manual Oil Palm Agronomy – Pengelolaan Pestisida No.FR.COP.OPA.PPS.</p> <p>PT. Ketapang Agro Lestari refers to Operational Best Practices Manual Oil Palm Agronomy – Prosedur Petunjuk Keamanan Pestisida No.FR.COP.OPA.PLP. Section 6.1 Pesticide Selection – shall first identify type of pest, type of disease or type of weed. The pesticide shall inform type of pest, disease and target species, application method and hazard/impact.</p>	Pest	Active ingredient	Dosage per Ha	Setothosea asigna	Deltametrin	200 ml	Setora nitens	Lamda Sihalotrin	200 ml	Darna trima	Betasiflutrin	225 ml	Ploneta diducta	Sipermetrin	300 ml	Mahasena corbeti	Asefat	650 ml	Metisa plana	
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		Dithane	<i>Mankozeb</i>	5.000	II	Fungal pests that cause leaf spot disease
		Brantas 25 EC	<i>Lamda sihalotrin</i>	1.051	III	Broadleaf weed
		Dejavu	<i>Fluroksipir</i>	3.000	III	Broadleaf weed
		Antong 75SP	<i>Asefat</i>	1.486	U	Pocket caterpillar (Metisa plana)
		Chepate 75SP	<i>Asefat</i>	1.486	U	Pocket caterpillar (Metisa plana)
		Sime pheromone RP	<i>Etil metiloktanoat</i> 4	>5.000	U	Horn beetle (fero trap)
		Polydor	<i>Lamda sihalotrin</i>	56	III	(Metisa plana), hama ulat api (Those asigna)
		Decis	<i>Deltamterin</i>	86	II	Hama ulat api (Thosea asigna)
		Kixor	<i>Saflufenasil</i>	2.000	III	Gulma berdaun lebar
		Nordox 56WP	<i>Copper oxide</i>	5.000	II	Hama jamur yang berupa penyakit karat daun Hemileia vastatrix
		Rotraz 200EC	<i>Amitraz</i>	>400	II	Hama kutu daun (Aphis sp dan pengisap daun Helopeltis antonii)

7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p>	<p>PT. Ketapang Agro Lestari prepared the calculation for pesticide use with active ingredient use, active ingredient and LD50 applied per Ha – monitored per year.</p> <p>2021 (January – September)</p> <table border="1" data-bbox="1133 515 1975 1042"> <thead> <tr> <th>Active Ingredient</th> <th>Brand</th> <th>LD50 (mg/kg)</th> <th>Concentration</th> <th>Toxicity per Liter</th> <th>TOTAL Chemical used</th> <th>Toxicity Planted</th> </tr> </thead> <tbody> <tr> <td>Glufosinat-ammonium</td> <td>Lifeline 280SL</td> <td>2,000</td> <td>256</td> <td>128</td> <td>3,331</td> <td>426,304</td> </tr> <tr> <td>Glifosat</td> <td>Round up</td> <td>9,041</td> <td>360</td> <td>40</td> <td>18,441</td> <td>734,307</td> </tr> <tr> <td>Metil metsulfuron</td> <td>Metafuron 20WP</td> <td>8,000</td> <td>20.05</td> <td>3</td> <td>3,036.40</td> <td>7.610</td> </tr> <tr> <td>Glifosat</td> <td>Supremo 480SL</td> <td>3,129</td> <td>356</td> <td>114</td> <td>120</td> <td>13,653</td> </tr> <tr> <td>Triklopir</td> <td>Garlon</td> <td>1581</td> <td>480</td> <td>304</td> <td>2061.5</td> <td>625,882</td> </tr> <tr> <td>2,4-D Dimetil amina</td> <td>Lindomin 865 SL</td> <td>2,872</td> <td>865</td> <td>301</td> <td>187</td> <td>56,201</td> </tr> <tr> <td>Fluroksipir</td> <td>Starane</td> <td>5,000</td> <td>333</td> <td>67</td> <td>157</td> <td>10,456</td> </tr> </tbody> </table>	Active Ingredient	Brand	LD50 (mg/kg)	Concentration	Toxicity per Liter	TOTAL Chemical used	Toxicity Planted	Glufosinat-ammonium	Lifeline 280SL	2,000	256	128	3,331	426,304	Glifosat	Round up	9,041	360	40	18,441	734,307	Metil metsulfuron	Metafuron 20WP	8,000	20.05	3	3,036.40	7.610	Glifosat	Supremo 480SL	3,129	356	114	120	13,653	Triklopir	Garlon	1581	480	304	2061.5	625,882	2,4-D Dimetil amina	Lindomin 865 SL	2,872	865	301	187	56,201	Fluroksipir	Starane	5,000	333	67	157	10,456	Complied
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p>	<p>PT. Ketapang Agro Lestari refers to Operational Best Practices Manual Oil Palm Agronomy – Pengendalian Hama dan Penyakit No.FR.COP.OPA.PHT. Section 6.7.5 Economic threshold or leaf eating caterpillar: <i>Setothosea asigna</i> 5/frond; <i>Setora nitens</i> 5/frond; <i>Darna trima</i> 10/frond; <i>Ploneta diducta</i> 10/frond; <i>Mahasena corbetti</i> 5/frond; <i>Metisa plana</i> 10/frond.</p> <p>Section 6.7.6 Control</p> <ul style="list-style-type: none"> - Manual: handpicking, cocoon picking, light trap. - Biological control: bio-insecticide through <i>Bacillus thuringensis</i>, virus or fungi, conservation and exploitation of natural predator, use of beneficial plant. - Chemical control: spraying/fogging chemical insecticide, trunk injection, root infuse. <p>Section 6.7.6.7 Contact insecticide</p> <table border="1" data-bbox="1133 871 1966 1222"> <thead> <tr> <th>Pest</th> <th>Active ingredient</th> <th>Dosage per Ha</th> </tr> </thead> <tbody> <tr> <td><i>Setothosea asigna</i></td> <td>Deltametrin</td> <td>200 ml</td> </tr> <tr> <td><i>Setora nitens</i></td> <td>Lamda Sihalotrin</td> <td>200 ml</td> </tr> <tr> <td><i>Darna trima</i></td> <td>Betasiflutrin</td> <td>225 ml</td> </tr> <tr> <td><i>Ploneta diducta</i></td> <td>Sipermetrin</td> <td>300 ml</td> </tr> <tr> <td><i>Mahasena corbeti</i></td> <td>Asefat</td> <td>650 ml</td> </tr> <tr> <td><i>Metisa plana</i></td> <td></td> <td></td> </tr> </tbody> </table>	Pest	Active ingredient	Dosage per Ha	<i>Setothosea asigna</i>	Deltametrin	200 ml	<i>Setora nitens</i>	Lamda Sihalotrin	200 ml	<i>Darna trima</i>	Betasiflutrin	225 ml	<i>Ploneta diducta</i>	Sipermetrin	300 ml	<i>Mahasena corbeti</i>	Asefat	650 ml	<i>Metisa plana</i>			Complied
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7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p>	<p>In PT. Ketapang Agro Lestari, there is no prophylactic use of pesticide.</p>	Complied																					

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7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>Based on review of document "Daftar Pestisida yang Digunakan Tahun 2021" – record of pesticide uses in 2021, there is no use of paraquat, or other pesticides categorized as WHO Class 1A or 1B by the plantation in 2021.</p> <table border="1" data-bbox="1131 507 1977 1377"> <thead> <tr> <th>Brand</th> <th>Active Ingredient</th> <th>LD50</th> <th>WHO Class</th> <th>Sasaran</th> </tr> </thead> <tbody> <tr> <td>Bionasa 480 SL</td> <td><i>Glifosat</i></td> <td>5.000</td> <td>III</td> <td>Weeds with broad and narrow leaves</td> </tr> <tr> <td>Roundup 486 SL</td> <td><i>Glifosat</i></td> <td>9.041</td> <td>III</td> <td>Weeds with broad and narrow leaves</td> </tr> <tr> <td>Garlon 670 EC</td> <td><i>Triklpir</i></td> <td>1.581</td> <td>II</td> <td>Broadleaf weeds, shrubs, woody weeds (wood saplings)</td> </tr> <tr> <td>Lifeline 280 SL</td> <td><i>Glufosinat</i></td> <td>2.000</td> <td>II</td> <td>Weeds with broad and narrow leaves</td> </tr> <tr> <td>Metafuron 20WP</td> <td><i>Metil metsulfuron</i></td> <td>8.000</td> <td>U</td> <td>Weeds with broad and narrow leaves</td> </tr> <tr> <td>Basta 150SL</td> <td><i>Glufosinat</i></td> <td>1.910</td> <td>II</td> <td>Weeds with broad and narrow leaves</td> </tr> <tr> <td>Metsulindo 20WP</td> <td><i>Metil metsulfuron</i></td> <td>5.000</td> <td>III</td> <td>Weeds with broad leaves</td> </tr> <tr> <td>Marshal 5G</td> <td><i>Karbosulfan</i></td> <td>905</td> <td>U</td> <td>Pests of horn beetles, bag worms, <i>Metisa plana</i>, pests of <i>sexava nubile</i></td> </tr> <tr> <td>Scud</td> <td><i>Sipermetrin</i></td> <td>247</td> <td>II</td> <td>Pest of horn beetles (<i>Oryctes rhinoceros</i>)</td> </tr> </tbody> </table>	Brand	Active Ingredient	LD50	WHO Class	Sasaran	Bionasa 480 SL	<i>Glifosat</i>	5.000	III	Weeds with broad and narrow leaves	Roundup 486 SL	<i>Glifosat</i>	9.041	III	Weeds with broad and narrow leaves	Garlon 670 EC	<i>Triklpir</i>	1.581	II	Broadleaf weeds, shrubs, woody weeds (wood saplings)	Lifeline 280 SL	<i>Glufosinat</i>	2.000	II	Weeds with broad and narrow leaves	Metafuron 20WP	<i>Metil metsulfuron</i>	8.000	U	Weeds with broad and narrow leaves	Basta 150SL	<i>Glufosinat</i>	1.910	II	Weeds with broad and narrow leaves	Metsulindo 20WP	<i>Metil metsulfuron</i>	5.000	III	Weeds with broad leaves	Marshal 5G	<i>Karbosulfan</i>	905	U	Pests of horn beetles, bag worms, <i>Metisa plana</i> , pests of <i>sexava nubile</i>	Scud	<i>Sipermetrin</i>	247	II	Pest of horn beetles (<i>Oryctes rhinoceros</i>)	Complied
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		Dithane	<i>Mankozeb</i>	5.000	II	Fungal pests that cause leaf spot disease
		Brantas 25 EC	<i>Lamda sihalotrin</i>	1.051	III	Broadleaf weed
		Dejavu	<i>Fluroksipir</i>	3.000	III	Broadleaf weed
		Antong 75SP	<i>Asefat</i>	1.486	U	Pocket caterpillar (Metisa plana)
		Chepate 75SP	<i>Asefat</i>	1.486	U	Pocket caterpillar (Metisa plana)
		Sime pheromone RP	<i>Etil metiloktanoat</i> 4	>5.000	U	Horn beetle (fero trap)
		Polydor	<i>Lamda sihalotrin</i>	56	III	(Metisa plana), hama ulat api (Those asigna)
		Decis	<i>Deltamterin</i>	86	II	Hama ulat api (Thosea asigna)
		Kixor	<i>Saflufenasil</i>	2.000	III	Gulma berdaun lebar
		Nordox 56WP	<i>Copper oxide</i>	5.000	II	Hama jamur yang berupa penyakit karat daun Hemileia vastatrix
		Rotraz 200EC	<i>Amitraz</i>	>400	II	Hama kutu daun (Aphis sp dan pengisap daun Helopeltis antonii)

	7.2.5b Why there is no other alternative which can be used.	Based on review of document "Daftar Pestisida yang Digunakan Tahun 2021" – record of pesticide uses in 2021, there is no use of paraquat, or other pesticides categorized as WHO Class 1A or 1B by the plantation in 2021.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Based on review of document "Daftar Pestisida yang Digunakan Tahun 2021" – record of pesticide uses in 2021, there is no use of paraquat, or other pesticides categorized as WHO Class 1A or 1B by the plantation in 2021.	
	7.2.5d Process to limit the negative impacts of the application.	Based on review of document "Daftar Pestisida yang Digunakan Tahun 2021" – record of pesticide uses in 2021, there is no use of paraquat, or other pesticides categorized as WHO Class 1A or 1B by the plantation in 2021.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Based on review of document "Daftar Pestisida yang Digunakan Tahun 2021" – record of pesticide uses in 2021, there is no use of paraquat, or other pesticides categorized as WHO Class 1A or 1B by the plantation in 2021.	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	<p>The training for the personnel who applying pesticides has conducted on 29 June 2021.</p> <p>The certification unit has communicated the importance of MSDS onto chemical warehouse keeper, with aspects of health, safety and environment. Safety officer carried out training and dissemination to warehouse keepers related to importance and information on MSDS. The certification unit provides sprayers with PPE: glasses, mask, apron, rubber hand glove, overall and rubber boot.</p>	Complied
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices.	Pesticides were stored in the determined area separated from fertilizer and other chemicals. Pesticides storage provided in central warehouse and it was locked areas with limited access. The storage ventilated	Non-compliance

		<p>through cross flow ventilation. MSDS and hazard symbol label were provided nearby of pesticides.</p> <p>Emergency shower and eyewash were also provided to anticipate in case of an emergency of chemical handling. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves.</p> <p>Nonconformity found during audit</p> <p>Some of Agrochemical MSDS was not provided in the agrochemical storage.</p> <p>There is no bound wall and spill control in the agrochemical storage.</p>	
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>According to the procedure Waste Management FR.CSM.OP.1 Ex pesticides container are treat as hazardous waste. The ex pesticide container store in the Licenced Temporary hazardous waste storage with maximum 180 day and deliver to the Licenced transporter and vendor of hazardous waste.</p> <p>Record of hazardous waste handling were presented in "Neraca Limbah B3" and Manifest Limbah B3. During audit both document were available and properly maintained.</p> <p>Nonconformity found during audit</p> <p>During field visit found that some ex chemical container are disposed in to the landfill (TPSA).</p> <p>Company has taken action by develop the corrective action plan; Audit team has accepted the CAP. The effectiveness of implementation will be verified in the next surveillance assessment.</p>	Non-compliance
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is	<p>There is no aerial spraying of pesticide implemented in PT Ketapang Agro Lestari. It was confirmed with company management and during field visit to KAL Estate.</p>	Not Applicable

	provided to affected local communities at least 48 hours prior to application of aerial spraying.		
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	<p>Nonconformity found during audit:</p> <p>There is no Specific annual medical surveillance for pesticide operators has been conducted by PT KAL</p> <p>According to SOP Pemantauan Pemeriksaan Kesehatan Karyawan Nomor FR.OSH.P21 tanggal 1 September 2011, stated that MCU for workers conducted once a year.</p> <p>Confirmed during interview with spraying workers that they have not get medical surveillance since they work until now.</p>	Non-compliance
7.2.11	(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.	<p>PT Ketapang Agro Lestari has a policy to prohibit the pregnant or breastfeeding women to handling pesticide working or fertilizer working. The policy was present in "Surat Edaran Nomor: PH/SE/003/IX/2021" dated 2 September 2021.</p> <p>In the policy point 3. stated that pregnant and breastfeeding woman are prohibit to conduct the chemical working (pesticide, fertilizer, etc).</p> <p>During interview with women spraying workers confirmed that there is no pregnant or breastfeeding women work as pesticide sprayer. They have a regular pregnant test in the company clinic to ensure that there is no pesticide handling by pregnant women.</p>	Complied
Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.	<p>PT KAL has establish the procedure for waste management as per "SOP Manajemen Limbah Nomor: FR.CSM.OP.1 Rev. 2" dated 30 December 2018. Procedure explain the waste handling for non hazardous waste and hazardous waste.</p> <p>Non hazardous waste and its handling are as below:</p> <ul style="list-style-type: none"> - Domestic waste, plantation operational waste (ex plastic polybag from nursery). Both waste disposed in to the landfill. 	Complied

		<ul style="list-style-type: none"> - Empty fruit bunch from mill processing apply as a mulching in the oil palm plantation. - Fiber and shell from the mill processing use as a boiler fuel. - Scrap from the workshop activity collect and sell in to the collector. - Domestic water waste manage by waste water management. - Waste water from mill processing apply as land application. <p>Hazardous waste and its handling are as below:</p> <ul style="list-style-type: none"> - Ex chemical/pesticide container from estate operation & ex pesticide equipment are store in the temporary hazardous waste storage. - Used oil, used fuel filter, used battery, used TL lamp, used rags from workshop and equipment maintenance activity are store in the temporary hazardous waste storage. - Medical waste from clinic activity (sput, apul, flakon & infectious waste) are store in the temporary hazardous waste storage. - Used catridge, used toner, ex paint container and used lamp are store in the temporary hazardous waste storage. - Ex chemical container and ex chemical from laboratory analyzed, ex cartridge primer are store in the temporary hazardous waste storage. <p>All hazardous waste above are store in the Licenced temporary hazardous waste storage for maximum 180 day and deliver to the licenced transporter and vendor. PT KAL has obtained the licence permit for temporary hazardous waste storage according to "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kutai Barat Nomor: 668.4/783, DPMPTSP-TC/VII/2018 Tentang Izin Tempat Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT. Ketapang Agro Lestari di Kampung Penawang Kecamatan Siluq Ngurai Kabupaten Kutai Barat. Dated 16 July 2018, valid for 5 years.</p>	
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		<p>Manifest of hazardous waste and receipt of hazardous waste delivery can be shown during audit. Sample seen: Hazardous waste manifest dated 19/12/2020 consist of: used rags 1 drum (ADO 00015940), ex TL lamp 1.5 kg (ADO 00015939), Used oil 2 drum (ADO 00015941), used oil filter 1 drum (ADO 00015942), used battery 30 pcs (ADO 00015944), ex chemical container 125.6 kg (ADO 00015943).</p> <p>Report of hazardous waste handling and waste water handling are submitted each quarter to Dinas Lingkungan Hidup Kabupaten Kutai Barat and Provinsi Kalimantan Timur and Kementrian Lingkungan Hidupo dan Kehutanan. Evidence of report submission was sighted during audit and confirmed with the related institution/government body during interview.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>During interview with warehouse workers, laboratory workers and estate workers confirmed that they have understanding on the waste management procedure and hazardous waste handling.</p> <p>PT Ketapang Agro Lestari has a waste management plan, identifying type and source of waste and the disposal plan. PT Ketapang Agro Lestari prepared a procedure to handle hazardous waste under "SOP Manajemen Limbah Nomor: FR.CSM.OP.1 Rev. 2" dated 30 December 2018 explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p> <p>The company store hazardous waste in temporary storage with permit, The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Karunia Lumasindo.</p> <p>Nonconformity found during audit:</p> <p>During field visit to landfill it was found that some ex agrochemical container (5 pcs), ex used oil container (1 pcs) and I pcs ex insecticide container (baygon) disposed in to the landfill.</p>	<p>Non-compliance</p>

		<p>During field visit to Dispatch Pump House found ex used oil container.</p> <p>It was found eax chemical container (neon chemical solution) use as garbage near to weighbridge</p> <p>It was found ex engine oil caterpillar use as garbage near to engine room</p> <p>Company has taken action by develop the corrective action plan; Audit team has accepted the CAP. The effectiveness of implementation will be verified in the next surveillance assessment.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>All waste products has been identified and documented under the ""SOP Manajemen Limbah Nomor: FR.CSM.OP.1 Rev. 2"" dated 30 December 2018. Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste. Regulation of domestic waste management refer to ""UU No. 18 Tahun 2008 tentang Pengelolaan Sampah"". PT Ketapang Agro Lestari has provide landfill for domestic waste. During field visit to landfill area at KAL Estate shown that landfill area has well managed and domestic waste handling in accordance with procedure and regulation.</p>	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>PT. Ketapang Agro Lestari has established SOP for fertilizing/manuring under SOP Pemupukan (MN.FR.COP.OPA.PMK) dated 1 July 2012. The procedure consists of company policy on fertilizer/nutrient application, deficiency symptoms (N, P, K, Mg, Cu, Fe, B), details of fertilizer to be applied, nutrient requirement, application and frequency for young and mature palm. The SOP also covers palm byproduct application, such as EFB and POME application. There were also guidelines for leaf sample taking under ""Pedoman Umum Pengambilan Contoh Daun/LSU di Lapangan"". The procedures are implemented and monitored to ensure optimum yield and minimize environmental impact.</p>	Complied

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7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p>	<p>Periodical leaf analysis of PT KAL is done by internal group research laboratory. Result of leaf sampling analysis are presented in Leaf Analysis Result Lab. ref.24/PSG/RST-LAB/V/2020 on 30 April 2020, 150 samples and Lab.ref.44/PSG/RST-LAB/VI/2021 on 31 May 2021, 150 samples.</p> <p>Soil Analysis conducted in October 2019, based on "Laporan Survey Tanah Semi Detail oleh Tim Soil Survey & Evaluasi Lahan – R&D First Resources". Based on the report, Soil Map Units and Land Classification at KAL Estate are:</p> <table border="1" data-bbox="1131 678 1841 925"> <thead> <tr> <th>Soil Type</th> <th>Slope (%)</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>Typic Hapludults</td> <td>8-15</td> <td>4.037</td> </tr> <tr> <td>Typic Hapludults</td> <td>15-30</td> <td>1.944</td> </tr> <tr> <td>Typic Endoaquidt</td> <td>0-8</td> <td>1.359</td> </tr> <tr> <td>Total</td> <td></td> <td>7.340</td> </tr> </tbody> </table>	Soil Type	Slope (%)	Ha	Typic Hapludults	8-15	4.037	Typic Hapludults	15-30	1.944	Typic Endoaquidt	0-8	1.359	Total		7.340	Complied
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7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>There was nutrient recycling strategy performed by PT. KAL such as land application from POME (Palm Oil Mill Effluent) and Empty fruit bunch (EFB) application. POME or liquid waste from mill used as Land application, it gives nutrient for palm oil plantation.</p> <p>PT KAL has a permit of Land Application as per "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan terpadu Satu Pintu Kabupaten Kutai Barat Nomor: 666.3/1361/DPMPSTP-TU/XII/2018 tentang Izin Pemanfaatan Air Limbah Industri Minyak Sawit ke Tanah Perkebunan Kelapa Sawit (Land Application) atas nama PT ketapan Agro Lestari Lokasi di Kecamatan Siluq Ngurai Kabupaten Kutai Barat, Provinsi Kalimantan Timur" dated 11 December 2018, valid for 3 years (until 11 December 2021). Land Application area is 203,04 ha (Blok B58, B57, B56, A68, A69, A67).</p>	Complied															

		<p>EFB were applied based on the recommendation from R&D in terms of dosage per ha and location. EFB were applied in Ketapang Agro Lestari Estate by manually. EFB were not applied nearby housing and water spring. Empty fruit bunch application was performed as mulch ground cover and added of organic material. Records of EFB application in Ketapang Agro Lestari Estate are available.</p> <p>EFB and POME application in 2021 (until September):</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB processed (MT)</th> <th>POME (m³)</th> <th>EFB (MT)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>17,016</td> <td>19,044</td> <td>2,994</td> </tr> <tr> <td>February</td> <td>7,419</td> <td>17,583</td> <td>1,439</td> </tr> <tr> <td>March</td> <td>10,643</td> <td>14,066</td> <td>1,991</td> </tr> <tr> <td>April</td> <td>8,906</td> <td>14,001</td> <td>1,389</td> </tr> <tr> <td>May</td> <td>7,962</td> <td>15,847</td> <td>1,103</td> </tr> <tr> <td>June</td> <td>15,850</td> <td>10,024</td> <td>2,227</td> </tr> <tr> <td>July</td> <td>15,830</td> <td>9,095</td> <td>2,374</td> </tr> <tr> <td>August</td> <td>15,471</td> <td>8,511</td> <td>2,320</td> </tr> <tr> <td>September</td> <td>14,567</td> <td>10,154</td> <td>1,320</td> </tr> <tr> <td>Total</td> <td>113,664</td> <td>118,325</td> <td>17,157</td> </tr> </tbody> </table>	Month	FFB processed (MT)	POME (m ³)	EFB (MT)	January	17,016	19,044	2,994	February	7,419	17,583	1,439	March	10,643	14,066	1,991	April	8,906	14,001	1,389	May	7,962	15,847	1,103	June	15,850	10,024	2,227	July	15,830	9,095	2,374	August	15,471	8,511	2,320	September	14,567	10,154	1,320	Total	113,664	118,325	17,157	
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7.4.4	Records of fertilizer inputs are maintained.	<p>The result of leaf sampling analysis, soil sampling analysis along with visual analysis, planting material, planting age and rain fall are considered in proposing the Fertilizer Recommendation. Fertilizer Recommendation and realization for year 2021:</p> <table border="1"> <thead> <tr> <th>Fertilizer</th> <th>Budget (Kg)</th> <th>Realization (Kg)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Urea</td> <td>1.395.639</td> <td>1.231.738</td> <td>88,26</td> </tr> </tbody> </table>	Fertilizer	Budget (Kg)	Realization (Kg)	%	Urea	1.395.639	1.231.738	88,26	Complied																																				
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		MOP	1584.958	700.777	44,21		
		RPH	925.705	133.371	14,41		
		Kiesrite	118.772	45.477	38,29		
		Dolomit	713.012	716.919	100,55		
		HGFB	80.545	10.615	13,18		
Criteria 7.5: Practices minimise and control erosion and degradation of soils.							
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>PT. Ketapang Agro Lestari refers to “Kebijakan dan Prosedur Pengelolaan Lahan Marjinal No.MN.FR.COP.OPA.PLM.Rev.01” – Policy and procedure management of marginal land. Marginal land defined as low productivity due to low physical/chemical/mineral fertility – depends on physiographic location and building factor of soil, including peat area, tidal area, folding area, faulting area, sand area, lateritic area, aquic area, poor drainability. For each type or marginal land, defined with specific management plan.</p> <p>Soil type analysis based on soil survey by “Laporan Survey Tanah dan Evaluasi Lahan Pada Tingkat Semi Detail Kebun Ketapang Agro Lestari PT. KAL” on 9 October 2019 was available soil map in scale 1:80000. The dominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquults</i>. Based on the report there is no peat and fragile soil identified in Ketapang Agro Lestari Estate.</p>					Complied
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	<p>PT. Ketapang Agro Lestari refers to Operational Best Practices “Persiapan Lahan No.MN.FR.COP.OPA.PLH” – Policy and procedure land preparation. Section 6.16.9 For area with slope more than 12° or slope more than 27%, the construction of palm platform and/or terrace is required.</p> <p>Based on field visit to Division IV Block E.83, the area was on slope 5-10%.</p>					Complied

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7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	<p>PT. Ketapang Agro Lestari refers to Operational Best Practices "Persiapan Lahan No.MN.FR.COP.OPA.PLH" – Policy and procedure land preparation. Section 6.16.9 For area with slope more than 12° or slope more than 27%, the construction of palm platform and/or terrace is required.</p> <p>Based on field visit to Division IV Block E.83, the area was on slope 5-10%.</p>	Complied
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	<p>Maps that identify marginal and fragile soils, including steep sloped land area are available in soil survey result - "Laporan Survey Tanah dan Evaluasi Lahan Pada Tingkat Semi Detail Kebun Ketapang Agro Lestari PT. KAL". Most of PT. KAL- KAL Estate's land is S3 class, to achieve / maintain the potential of S2 production, several things recommended with the soil and plants in the plantation, including:</p> <ol style="list-style-type: none"> 1. Making and maintaining the contour terrace optimally, so that there is no erosion or landslide on slope area; 2. Ensure that interrow area is not too clean, and if possible, it must always be covered with cover crops. Maintenance of cover crops is very useful in reducing surface runoff / erosion and increasing levels of organic matter. Cover crops of grass and ferns are still possible to grow in plantation even though almost all of the area is old plants. 3. Provision of organic material (e.g. empty fruit bunches) applied on the soil surface in the heap, especially on bumpy land to steep hills. Not recommended applying EFB to lowland areas. EFB dosage of at least 20 tons to 50 tons per hectare is common for plantation, and is done in stages according to the EFB production capacity of the palm oil mill (PKS). EFB application in stages and need to be repeated every year until the soil organic matter content reaches 	Complied

		<p>about 3% on the soil surface, is highly recommended. By repeating the application of organic matter for 3 years, the expected soil friability / fertility can be achieved.</p> <ol style="list-style-type: none"> 4. If the wavy to hilly land has reached the estimated productivity figure, the application of EFB is recommended for other areas that have high productivity targets but still low in actual production. 5. The use of a soil reparer in the form of Dolomite is highly recommended, prior to application of the necessary fertilizers. The recommended dose of Dolomite for the whole plant ranges from 2.00-3.00 kg/palm/year applied on the palm circle before fertilizer application. Repetition of Dolomite for 3 consecutive years is sufficient to improve soil reaction (soil pH). Dolomite has a dual role, in addition to be a soil reparer it also acts as Mg fertilizer. 6. POME land application in the plantation, starting from choppy to steep hilly areas, is highly recommended. The application is gradual and more evenly distributed in the application area, will have a good impact on the soil and the surrounding environment. 7. The use of neutral fertilizers such as Urea (N sources), RP (P sources), KCl (K sources), and dolomite (Mg sources) or NPK-compound fertilizers with neutral raw materials, preferably slow release, are highly recommended. <p>Technical cultivation and harvesting of FFB must be carried out in accordance with large plantation principles include optimization of pruning, cleaning of crop circle from weeds and woods, controlling weeds in the fields, controlling pests and diseases, harvesting correctly (including obeying crop rotation, discipline in FFB quality, collecting loose fruit on the circle and those in midrib, and there shall be no delay in FFB delivery to the palm oil mill.</p> <p>Semi detail soil map, scale 1:80,000 indicating the marginal land potentially identified for area with slope of 15-30%.</p>	
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		Soil Type	Slope (%)	Ha	
		Typic Hapludults	8-15	4.037	
		Typic Hapludults	15-30	1.944	
		Typic Endoaquult	0-8	1.359	
		Total		7.340	
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	<p>PT. Ketapang Agro Lestari refers to Operational Best Practices "Persiapan Lahan No.MN.FR.COP.OPA.PLH" – Policy and procedure land preparation. Section 6.16.9 For area with slope more than 12° or slope more than 27%, the construction of palm platform and/or terrace is required.</p> <p>Based on field visit to Division IV Block E.83, the area was on slope 5-10%.</p>			Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	<p>Soil survey as mentioned in the SOP "Prosedur Layanan Survey Tanah" rev.0 has mentioned in the point 6.1.6 that the interval of Soil Survey conducted every 5 (five) year.</p> <p>PT KAL demonstrated topographic map for KAL Estate, scale 1:80,000. From the topographic map, the plantation was located in area with slope 0-8%, 8-15% and 15-30%.</p> <p>PT. Ketapang Agro Lestari engaged PT Panca Surya Garden laboratory for soil test and demonstrate Soil Test Result "Hasil Pengujian Tanah No.10/R&D/PSG/SOILSURVEY/IX/2019 dated sample 07 October 2019.</p>			Complied
<p>Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>					
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	<p>The company has a map with scale 1:80.000 sources from Survey and Soil Mapping 9 October 2019, Concession PT KAL, NKRI Map. The map has explained that the soil type is Typic hapludults and Typic Endoaquult, there is no fragile soil and peat soil.</p>			Complied

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7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	The company has a map with scale 1:80.000 sources from Survey and Soil Mapping 9 October 2019, Concession PT KAL, NKRI Map. The map has explained that the soil type is Typic hapludults and Typic Endoaquadult, there is no fragile soil and peat soil.	Complied
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	The company has a map with scale 1:80.000 sources from Survey and Soil Mapping 9 October 2019, Concession PT KAL, NKRI Map. The map has explained that the soil type is Typic hapludults and Typic Endoaquadult, there is no fragile soil and peat soil. The requirement for monitoring peat subsidence is not applicable. Not applicable.	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	The company has a map with scale 1:80.000 sources from Survey and Soil Mapping 9 October 2019, Concession PT KAL, NKRI Map. The map has explained that the soil type is Typic hapludults and Typic Endoaquadult, there is no fragile soil and peat soil. The requirement for monitoring peat subsidence is not applicable. Not applicable.	Complied
7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.	The company has a map with scale 1:80.000 sources from Survey and Soil Mapping 9 October 2019, Concession PT KAL, NKRI Map. The map has explained that the soil type is Typic hapludults and Typic Endoaquadult, there is no fragile soil and peat soil. Drainability Assessment is not required. Not applicable.	Not Applicable

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7.7.6	(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).	The company has a map with scale 1:80.000 sources from Survey and Soil Mapping 9 October 2019, Concession PT KAL, NKRI Map. The map has explained that the soil type is Typic hapludults and Typic Endoaquadult, there is no fragile soil and peat soil. The requirement for peat soil is not applicable. Not applicable.	Not Applicable
7.7.7	(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.	The company has a map with scale 1:80.000 sources from Survey and Soil Mapping 9 October 2019, Concession PT KAL, NKRI Map. The map has explained that the soil type is Typic hapludults and Typic Endoaquadult, there is no fragile soil and peat soil. The requirement for peat soil is not applicable. Not applicable.	Not Applicable
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters: 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.	The company has SOPs for identification, management and maintenance of water sources and quality which are outlined in: - "SOP Pemantauan Lingkungan FR.EMS.MME Rev.2 tanggal 19 November 2018". Describes the process of monitoring surface water quality to determine the effectiveness of environmental management on surface water conditions. Surface water being monitored includes: river water, sea water, elephant moats, canals, etc. Observations are made every 6 (six) months. - "SOP Identifikasi, Pengelolaan dan Pemantauan Nilai Konservasi Tinggi (NKT) Nomor: FR.EAC.IMM, Rev. 02 tanggal 12 Januari 2015". Describes the types of high conservation value areas including water sources and riparian areas, identification of high conservation value areas and their management and monitoring. Water sources are categorized as HCV 4. Its management aims to ensure the continuity	Complied

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		<p>of the provision of various key environmental services that can logically be affected by land use in a landscape.</p> <p>PT KAL already has a map of water bodies documented in the PT Ketapang Agro Lestari HCV 1 Map. Based on the HCV 1 map, it is known that there is one stream of the Pour River that extends in the area of PT Ketapang Agro Lestari and one location of the Penawang spring. The identified water body is 34.70 ha with a border area of 518.48 ha.</p> <p>The Company has a water management document, both in the estate and mill. Monitoring the implementation of water management has been implemented on a regular basis, such as surface water quality monitoring each semester at Kalundang river (upstream and downstream) are available in the report of RKL/RPL. Company has analysed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard.</p> <p>The last monitoring of surface water quality was carried out on March 6, 2021 by the Laboratorium Pusat Penelitian Lingkungan Hidup dan Sumberdaya Alam Universitas Mulawarman. Test Result Report No: 012/LHU/LAB.A/III/2021 shows that in general the test parameters meet environmental quality standards.</p>	
	7.8.1b Workers have adequate access to clean water.	<p>Company provide the clean water for workers at housing area with clean water from Mill for Mill workers Housing. Regular water analysis was performed to monitor the water quality in mill.</p> <p>Interview with workers during onsite audit confirmed that they have adequate access to clean water provide by company.</p>	
7.8.2	(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or	<p>PT KAL already has a map of water bodies documented in the PT Ketapang Agro Lestari HCV 1 Map. Based on the HCV 1 map, it is known that there is one stream of the Pour River that extends in the area of PT Ketapang Agro Lestari and one location of the Penawang spring. The identified water body is 34.70 ha with a border area of 518.48 ha.</p>	Complied

	<p>Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>PT KAL has conducted HCV assessment since July 2011 before performing land clearing and planting oil palm. According to HCV assessment there were identified riparian buffer: Riparian of Sungai Penawang 518.48 ha and Riparian of Kiaq river 45.36 ha. Company has develop a programme to maintain the buffer zone including:</p> <ul style="list-style-type: none"> - Riparian restoration with forest vegetation plant/tree. - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. - Conserve natural vegetation in riparian zone - Restricted to conduct replanting palm oil in riparian area <p>During field visit to Penawang River and Kiaq River can be shown that riparian area are well maintained, no chemical application near to riparian, no disturbance on riparian, natural vegetation are protected and the signboard information and awareness are available.</p>	
<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>PT KAL has an effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic pond, Secondary Anaerobic pond, Acidification pond, and Buffering pond.</p> <p>PT KAL does not discharge wastewater into water bodies, but it is used for land application. PT KAL has obtained permit for land application according to "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan terpadu Satu Pintu Kabupaten Kutai Barat Nomor: 666.3/1361/DPMPSTP-TU/XII/2018 Tentang Izin Pemanfaatan Air Limbah Industri Minyak Sawit Ke Tanah Perkebunan Kelapa Sawit (Land Application) atas nama PT ketapan Agro Lestari Lokasi di Kecamatan Siluq Ngurai Kabupaten Kutai Barat Provinsi Kalimantan Timur" dated 11 December 2018, valid until 11 December 2021. Land application area covering 203.04 ha.</p> <p>As required by permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (PT Global</p>	<p>Complied</p>

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		<p>Environment Laboratory). According to recent testing result, all parameter of applied effluent has met the applicable threshold of KepMenLH No. 29 Tahun 2003.</p> <p>Sample seen effluent monitoring year 2021:</p> <table border="1" data-bbox="1133 507 1966 707"> <thead> <tr> <th rowspan="2">Parameter</th> <th rowspan="2">Standard</th> <th colspan="6">Analysis result</th> </tr> <tr> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> <th>Mei</th> <th>Jun</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>6.0 – 9.0</td> <td>8.58</td> <td>8.39</td> <td>8.49</td> <td>7.12</td> <td>7.19</td> <td>8.30</td> </tr> <tr> <td>BOD</td> <td><5000 mg/l</td> <td>1341</td> <td>1412</td> <td>1332</td> <td>1001</td> <td>1324</td> <td>1200</td> </tr> </tbody> </table> <table border="1" data-bbox="1133 754 1966 954"> <thead> <tr> <th rowspan="2">Parameter</th> <th rowspan="2">Standard</th> <th colspan="6">Analysis result</th> </tr> <tr> <th>Jul</th> <th>Aug</th> <th>Sept</th> <th>Oct</th> <th>Nov</th> <th>Dec</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>6.0 – 9.0</td> <td>8.34</td> <td>8.25</td> <td>8.18</td> <td></td> <td></td> <td></td> </tr> <tr> <td>BOD</td> <td><5000 mg/l</td> <td>3168</td> <td>1670</td> <td>1680</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Parameter	Standard	Analysis result						Jan	Feb	Mar	Apr	Mei	Jun	pH	6.0 – 9.0	8.58	8.39	8.49	7.12	7.19	8.30	BOD	<5000 mg/l	1341	1412	1332	1001	1324	1200	Parameter	Standard	Analysis result						Jul	Aug	Sept	Oct	Nov	Dec	pH	6.0 – 9.0	8.34	8.25	8.18				BOD	<5000 mg/l	3168	1670	1680				
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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>The company has Surface Water Permit as per Decree Letter of Minister of Public Works and Public Housing of the Republic Indonesia No. 910/KPTS/M/2021 dated 26 July 2021 related "Pemberian Izin Pengusahaan Sumberdaya Air" PT Ketapang Agro Lestari – Ketapang AGro Lestari POM at Tuang River is 18.014 M3/month.</p> <p>The unit of certification has water usage per ton FFB processing budget year 2021 is 0,9 m3/ton FFB. Based on water usage monitoring for period January – September 2021 sighted that below of budget.</p>	Complied																																																												
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																																																															
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented	PT KAL has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy under "Program Manajemen Lingkungan" year 2020/2021. To improving efficiency of the	Complied																																																												

		<p>use of fossil fuels such monitoring on use of fossil fuels. Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Since January – August 2021, shell usage for boiler fuel was 3,610 ton and Fiber usage as boiler fuel was 12,751 ton.</p>	
<p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
<p>7.10.1</p>	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>PT KAL has established "SOP Mitigasi Gas Rumah Kaca "FR.CSM.GRK" Rev. 2, dated 26 December 2018". Identification of GHG emission has been conducted by Palm Oil Mill and Estate, emission identified are covering: usage of anorganic fertilizer, pesticide, fossil fuel usage, and POME.</p> <p>Based on Significant pollution and GHG emission was identified, for estates comes from using of pesticides, action plan to reducing pesticide was made such as program of integrated pest control where minimize to use chemical/pesticides.</p> <p>The Certificate Holder has Strategic and Mitigation Plan to reduce GHG emission, in example as follow:</p> <ol style="list-style-type: none"> 1. Sector: Plantation operation. <ul style="list-style-type: none"> - Identification of Emission Sources: Land Clearing and Planting (Land Use Change). - Activities: Land Clearing. - Potential Mitigation Options: <ul style="list-style-type: none"> • Adopted Zero Burning Land Clearing methods • No Land Clearing in areas that identified as HCV area 	<p>Complied</p>

		<ul style="list-style-type: none"> • Keep the HCV area as Carbon Stock/sequestration • Periodically inspection and patrol to avoid HCV disturbance and land fire ✓ Activities: Fertilizing/Manuring ✓ Potential Mitigation Options: <ul style="list-style-type: none"> • Effective fertilizing based on dosages and recommendation from Agronomy Department • No Fertilizing on Rainy • No Fertilizing on Riparian Zone • Socialization to Worker the policy of Fertilizing in Company <p>The results of document verification and field visits, it is known that the company has made another efforts in reducing GHG emissions, such as:</p> <ul style="list-style-type: none"> - Has installed a dust collector to catch dust or particles flying in the air and also has monitored the air quality carried out by conducting air quality testing and reported every semester contained in the UKL-UPL report. - The use of fiber and shells as a boiler fuel to minimize the fossil fuel usage. - Utilization of waste water for Land applications to minimize the methane emission. - Utilization of EFB for composting to minimize the anorganic/chemical fertilizer usage. <p>PT KAL has conducted monitoring of emission, and then calculate it using RSPO PalmGHG Calculator Version 4. The monitoring and calculation covering estate, smallholder and mill operation. Emission reduction has achieved.</p> <p>There was available result of monitoring and calculation of pollutant and emission using Palm GHG Calculator. Emissions per product from estate</p>	
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		and mill activities for year 2020 are: 3.11 tCO ₂ e/ton CPO and 3.11 tCO ₂ e/ton PKO, sequestration in conservation area: -8,586.15 tCO ₂ e and crop sequestration are -58,398.63 tCO ₂ e.	
7.10.2	(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	HCS assessment has been conducted on February 2016 cooperated with Independent Environmental Consultant PT Ata Marie. HCS assessment also includes stakeholder consultation with surrounding community of lendien Liang Nanyuq and Penawang on 26 – 31 May 2016. In general, the forest in the study area has changed due to logging activities, and therefore the amount of carbon in the study area is relatively low. Based on Patch analysis, recommended to conserve the High Priority Patch with area of 784 ha and total potentially HCS to be conserve was 1,379 ha. PT KAL has overlay the HCS área identified with HGU área and the HCS área within HGU was 649.33 ha. The HCS assessment has taken into account wider landscape- level consideration. HCS area study are based on PT KAL location permit with area 8.122 ha.	Complied
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	PT KAL has identify other significant pollutant identification results as per “Evaluasi Aspek – Dampak Lingkungan” updated on January 2021. The Certificate Holder has implemented and monitored a plan to reduce pollutant and emission. Emission, particulate, and noise from boiler and generator are tested and monitored every six month. Records of all monitoring are kept and documented. According to record of emission and particulate monitoring shown that all parameter analyzed were met with the threshold/standard.	Complied
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	PT KAL has establish SOP for Land Clearing MN.FR.COP.OPA-PLH revision 1 dated 1 June 2013 “Land Preparation”. The SOP explains that land clearing is accompanied by a detailed master plan. The master plan is used as a basic part of plantation development planning, including determining the location of seedlings, planting area, infrastructure,	Complied

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		<p>housing "emplacement", mill location, and other uses along with the implementation time.</p> <p>Land preparation using zero burning technique as stated in point 6.7.d "The company's commitment is to apply the zero burning method", namely land clearing of plantations without burning.</p> <p>The procedure has established a land clearing method that is adapted to the conditions of the area.</p> <p>According to sampled of Land clearing contract "SPK No. KAL/100/SPK/X-18/DIR-PLANT antara PT. KAL dengan PT Kharisma Anugrah Lestari tanggal 31 Oktober 2018" shown that land learing was performed without burning, consist of: Falling tree, stacking, terraces, road construction, trench construction, bridge construction and construction of culverts covering an area of 346 hectares.</p> <p>According to Minutes of work Inspection of land celaring PT. KAL as per "Berita Acara Pemeriksaan Pekerjaan Pembukaan Lahan Kebun PT. KAL" shown that there is no burning in the activity of land clearing.</p>	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	<p>New planting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, trench construction, bridge construction and construction of culverts, planting LCC and planting oil palm.</p> <p>Based on field visit to Ketapang Agro Lestari Estate confirmed that the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in the agreement contract between company and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p>PT Ketapang Agro Lestari has provide the facility of fire prevention and mitigation. In addition company has formed the Fire Fighter organization structure and emergency response team. During filed visit to fire tools</p>	Complied

		<p>and equipment storage shown that there are sufficient facility has been provide for fire prevention and mitigation, among others:</p> <ol style="list-style-type: none"> 1. Pompa induk Tohatsu 4 unit 2. Fire pump (Goliath): 5 unit 3. Hose 2.5 inch: 17 unit 4. Hose 1.5 inch: 7 unit 5. Nozzle 2.5 inch Tohatsu: 3 unit 6. Nozzle 2.5 inch Goliath: 6 unit 7. Suction hose 1.5 inch: 5 unit 8. Suction hose 4 inch: 4 unit 9. Y connector 2.5/1.5x1.5: 5 unit 10. First Aid Kit: 2 unit 11. folding stretcher: 3 unit 12. Leather handgloves: 6 pasang 13. Safety Boots: 4 pasang 14. Chainsaw: 1 unit 15. Dual-function ax: 4 unit 16. Portabel wáter tankl: 11 unit 17. Kepyok: 10 unit 18. Sharp rake: 1 unit <p>Fire Fighter organization structure and emergency response team participated in fire fighting training and fire fighting simulations which were held on 6 October, 21 November and 23 November 2020 at the plantation, office and palm oil mill locations.</p>	
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7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	<p>The policy has communicated to all smallholder and local community to engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>Based on field visit to Ketapang Agro Lestari Estate confirmed that the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in the agreement contract between company and subcontractor that all activity of replanting is performed manual and mechanically.</p>	Complied
Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>PT Ketapang Agro Lestari has conducted the NPP process before conducting the new planting. NPP has been conducted since 2012 by TUV Nord.</p> <p>NPP Verification statement and assessment has been published by RSPO from 30 March 2012 to 29 April 2012. There is no comment from any stakeholder since the NPP assessment published on RSPO website https://www.rspo.org/certification/new-planting-procedure/public-consultations/first-resources-ltd-pt.-ketapang-agro-lestari-new-planting-assessment-call-for-comments</p> <p>According to NPP Verification statement made by TUV Nord "The AMDAL, HCV and SIA assessment report and management plan has been checked and verified by TUV Nord auditors through desktop study and verification of all related documents. TUV Nord auditors confirmed that the assessment and plan are comprehensive, professional and compliant of RSPO principles, criteria and indicators.</p> <p>There is no primary forest and HCV and HCS are cultivated for oil palm plantation. PT KAL has conducted the HCV assessment since 2010, HCS study on 2015 – 2016 by Independent Consultant Ata Marie.</p>	Complied

<p>7.12.2</p>	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows: 7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>PT KAL has conducted HCV assessment cooperated with Environmental consultant Yayasan Kelapa Sawit Berkelanjutan Indonesia on 6 – 13 July 2011. Based on HCV assessment, identified HCV area as below:</p> <ul style="list-style-type: none"> - HCV 1: Areas that contain an important biodiversity <ul style="list-style-type: none"> ✓ Riparian of Tuang river 518.48 ha ✓ Riparian of Kiaq river 45.36 ha ✓ Secondary forest Penawang 100 ha ✓ Water spring Penawang 12.6 ha - HCV 2: Landscape areas that are important for natural ecological dynamics <ul style="list-style-type: none"> ✓ Secondary forest Penawang 100 ha - HCV 4: Areas that provide natural environmental services <ul style="list-style-type: none"> ✓ Riparian of Tuang river 518.48 ha ✓ Riparian of Kiaq river 45.36 ha ✓ Secondary forest Penawang 100 ha ✓ Water spring Penawang 12.6 ha - HCV 5: Local Community Basic Needs) <ul style="list-style-type: none"> ✓ Lendian Secondary Forest 415.5 ha - HCV 6: Traditional Cultural Identity <ul style="list-style-type: none"> ✓ Cemetry of community Penawang 1.00 ha ✓ Cemetry of community Lendian 0.03 ha ✓ Cemetry of community Tendiq 0.50 ha <p>HCV area identified totally 992.94 ha. The HCV area identification was based on permit location or Izin Lokasi of PT KAL No. 525.26/K.941a/2010, 22 November 2010 with coverage area of 15,025 ha. PT KAL has obtained land title of HGU in 2019 with total area of 7,340.0313 Ha (consist of Plasma 1,474.3261 ha and nucleus plantation</p>	<p>Complied</p>
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	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>5,865.7052). PT KAL has overlay the HCV area identified with HGU area and the HCV area within HGU was 287 ha.</p> <p>HCV assessment has been conducted since July 2011 as above. HCV assessment conducted by environmental consultant Yayasan Kelapa Sawit Berkelanjutan Indonesia according to HCV toolkit; HCV assessment has include the stakeholder coinsultation</p> <p>HCS assessment has been conducted on February 2016 cooperated with Independent Environmental Consultant PT Ata Marie. HCS assessment also includes stakeholder consultation with surrounding community of lendian Liang Nanyuq and Penawang on 26 – 31 May 2016. In general, the forest in the study area has changed due to logging activities, and therefore the amount of carbon in the study area is relatively low. Based on Patch analysis, recommended to conserve the High Priority Patch with area of 784 ha and total potentially HCS to be conserve was 1,379 ha. PT KAL has overlay the HCS area identified with HGU area and the HCS area within HGU was 649.33 ha. Total area conservation in HGU PT KAL both HCV and HCS was 936.33 ha. The HCV and HCS assessment has taken into account wider landscape- level consideration.</p>	
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>Based on HCV and HCS assessment confirmed that there is no High Forest Cover Landscapes (HFCLs) identified in PT Ketapang Agro Lestari. In general, the forest in the study area has changed due to logging activities, and therefore the amount of carbon in the study area is relatively low. Only secondary forest identified in area of HGU PT Ketapang Agro Lestari.</p>	Complied
<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance</p>	<p>Based on HCV and HCS assessment confirmed that there is no peatland identified in area of PT Ketapang Agro Lestari.</p>	Complied

	<p>HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>PT Ketapang Agro Lestari has develop management and monitoring plan to protected and/or enhanced the HCV and HCS identified. Management and monitoring plan are included:</p> <ul style="list-style-type: none"> - Disseminate the results of the HCV Assessment which consists of Identification, Management and Monitoring to all employees, community and contractors - Make clear boundaries for HCV in the field according to the HCV map identified, make a prohibition/notice board e.g No cutting down trees, no hunting. - To rehabilitate damaged HCV areas, prepare tree species that can be used as rehabilitation plants by prioritizing local plants. - Land clearing in the plantation area with a Zero burning system (without burn) to prevent the HCV area from burning. - Apply fire risk control methods in HCV areas and land, including controlling weeds, setting up fire control towers and setting up fire control units, especially in fire prone areas. - If the local community will use Non-Timber Forest Products (NTFPs) in HCV areas (eg honey, rattan, meat, etc.), the company makes an agreement with the community to harvest Non-Timber Forest Products (NTFPs) in a sustainable manner according to the commodities used by the community. - For conflict prevention and mitigation, Management unit implements BMP or cooperates with BKSDA or other authorized agencies and/or competent institutions in handling animals. - Do not build roads, canals and other infrastructure in HCV. If HCVs are found, roads, canals and infrastructure must be closed by means of rehabilitation. - Maintaining water sources including inundation areas within HCVs or bordering HCVs in MUs that are important for animal life. 	
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		<ul style="list-style-type: none"> - Environmentally friendly plant pest control (OPT) (Integrated Pest Management) in the plantation area. - Fertilization and application of agricultural chemicals in the right dose, in the right way, at the right time, in the right type, and in the right location to prevent water pollution. - Carry out patrols in HCV areas. <p>HCV management and monitoring plan has been implemented by PT KAL; it was confirmed during field visit to HCV area.</p> <p>The management plan are reviewed once a year, latest review on June 2021.</p> <p>Reports on the results of HCV and biodiversity management have been reported annually by PT KAL. The 2021 report has been submitted on September 21, 2021 to the BKSDA of East Kalimantan Province in accordance with the "Handover Form" signed by the BKSDA and the seal of the BKSDA of East Kalimantan.</p>	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	<p>PT KAL has a policy of Sustainable Palm Oil and has a procedure for FPIC.</p> <p>PT. Ketapang Agro Lestari has established the SOP "Prosedur Pembayaran Tali Asih Pembebasan Lahan atau Pembebasan Lahan dan perhitungannya" dated January 18, 2010. Based on NPP report assessment team concluded that PT. Ketapang Agro Lestari carried out land acquisition resolutions with prior community approval, based on information from the SEIA report and the Minutes of Meetings with the public on activities to increase public awareness.</p>	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working	<p>PT KAL has a programme to educate the workforce and surrounding community to protect the HCV area and RTE species in area of PT KAL and surrounding area.</p> <p>PT KAL has conducted socialization related to HCV and RTE species protection to the community which was carried out on December 16,</p>	Complied

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	for the company is found to capture, harm, collect, trade, possess or kill these species.	<p>2020 at the Lendian village hall. Evidence of socialization can be shown in the form of reports on the results of socialization, socialization attendance and photo documentation of socialization.</p> <p>Based on the results of interviews with representatives of the surrounding community, it can be proven that they understand and understand the importance of protecting the HCV area and the animals that live around their environment.</p> <p>Socialization to internal company employees is regularly carried out through employee morning apples by field assistants. Socialization was also carried out by the company's Sustainability team, most recently held on September 14, 2021. The company also posted information boards and warnings regarding the protection of local protected areas, prohibition of hunting animals and destroying areas and other conservation campaigns.</p> <p>PT KAL also has a policy to prohibit illegal hunting including capture, harm, collect, trade, possess or kill the RTE species. Indiscipline sanction will be apply for the violation according to national law Undang Undang RI No.5 Tahun 1990 tentang Konservasi Sumber Daya Alam Hayati dan Ekosistemnya.</p>	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	<p>No Go Area Monitoring Report conducted each month.</p> <p>Monitoring No Go Loss PT KAL. There is no loss area of HCS by desktop verification the area of HCS and plantation development.</p>	Complied
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.	<p>PT Ketapang Agro Lestari has conducted the NPP process before conducting the new planting. NPP has been conducted since 2012 by TUV Nord.</p> <p>NPP Verification statement and assessment has been published by RSPO from 30 March 2012 to 29 April 2012. There is no comment from any stakeholder since the NPP assessment published on RSPO website https://www.rspo.org/certification/new-planting-procedure/public-</p>	Complied

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		<p>consultations/first-resources-ltd-pt.-ketapang-agro-lestari-new-planting-assessment-call-for-comments</p> <p>According to NPP Verification statement made by Tuv Nord "The AMDAL, HCV and SIA assessment report and management plan has been checked and verified by TUV Nord auditors through desktop study and verification of all related documents. TUV Nord auditors confirmed that the assessment and plan are comprehensive, professional and compliant of RSPO principles, criteria and indicators.</p> <p>There is no primary forest and HCV and HCS are cultivated for oil palm plantation. PT KAL has conducted the HCV assessment since 2010, HCS study on 2015 – 2016 by Independent Consultant Ata Marie.</p>	
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Ketapang Agro Lestari POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for **Ketapang Agro Lestari POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	3.11
PKO	0.00

Extraction	%
OER	26.74
KER	4.42

Production	t/yr
FFB Process	173,798.82
CPO Produced	46,482.4
PK Produced	7,685.5

Land Use	Ha
OP Planted Area	10457.27
OP Planted on peat	0.00
Conservation (forested)	1615.87
Conservation (non-forested)	0.00
Total	12,073.14

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	117905.45	1.87	24317.58	1.01	0.00	0.00	142223.03	0.818
CO ₂ Emission from fertilizer	3705.97	0.06	2352.39	0.10	0.00	0.00	6058.36	0.035
NO ₂ Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
Fuel Consumption	1130.45	0.02	2237.31	0.53	0.00	0.00	3367.76	0.019
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
Sink								
Crop Sequestration	-58398.63	-0.93	-34042.83	-1.41	0.00	0.00	-92441.46	-0.532
Conservation Sequestration	-8586.15	-0.14	-4457.08	-0.18	0.00	0.00	-13043.22	-0.075
Total	59332.77	0.94	-7286.62	-1.73	0.00	0.00	133491.57	0.768

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	34067.51	0.20
Fuel Consumption	596.48	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	34663.99	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

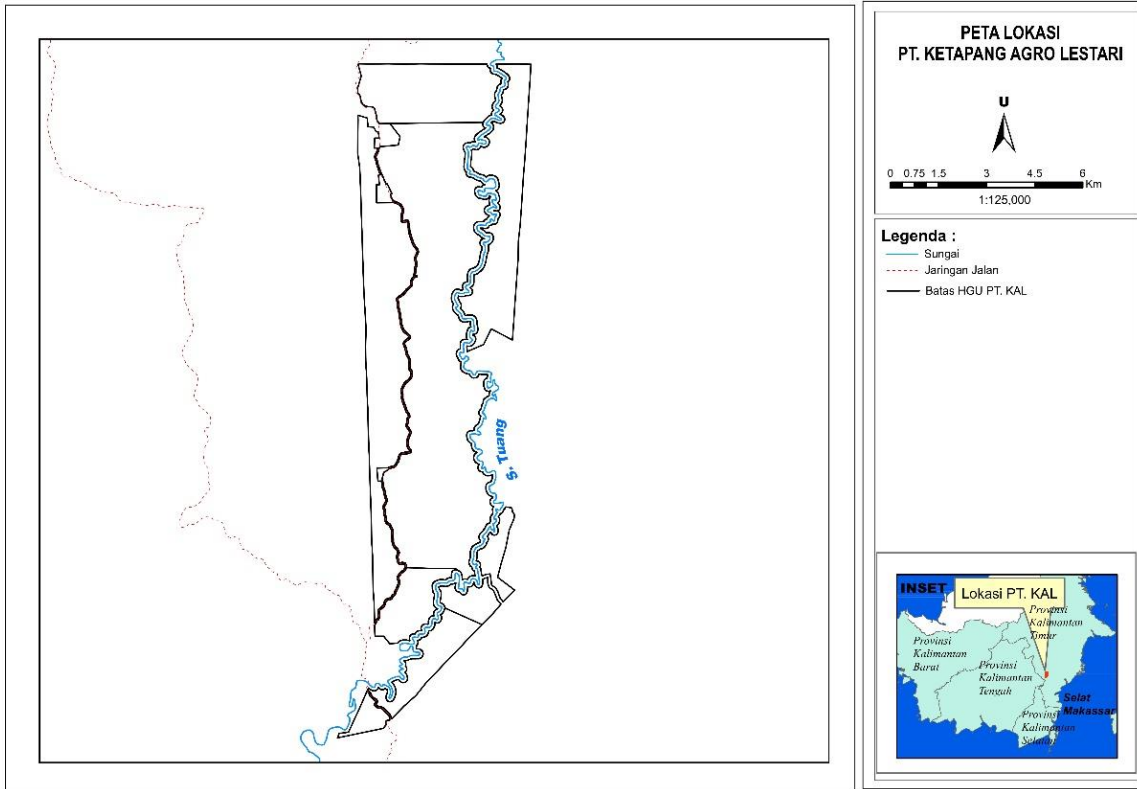
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

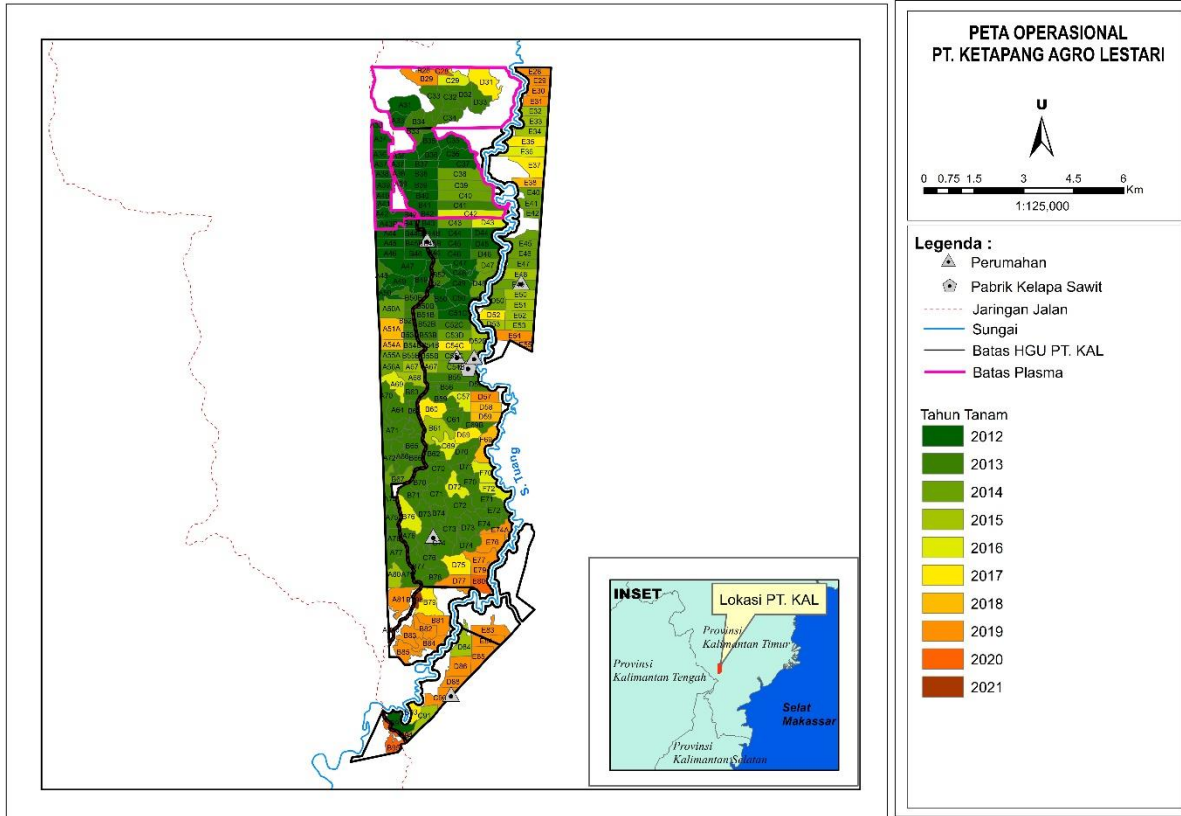
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



Appendix E: List of Smallholder Registered and sampled

No smallholder scheme within this certification scope. Not applicable

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure