

**RSPO PRINCIPLE AND CRITERIA –
ANNUAL SURVEILLANCE ASSESSMENT 3_1
Public Summary Report**

SIPEF Group:
Client company Address: <u>Forum Nine Building, 10th Floor, Suite 1-11</u> <u>Jl.Imam Bonjol No.9</u> <u>Medan – 20112</u> <u>Sumatera Utara Province</u> <u>Indonesia</u>
Certification Unit: PT. Tolan Tiga Indonesia – Perlabian POM Location of Certification Unit: Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province - 21463 Indonesia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0021-05-000-00	Membership Approval Date	7 th December 2005
Parent Company Name	SIPEF Group		
Address	Head Office: Forum Nine Building, 10th Floor, Suite 1-11 Jl. Imam Bonjol No.9, Medan - 20112 Sumatra Utara Province Indonesia Location Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province – 21463 Indonesia		
Subsidiary (Certification Unit Name)	PT. Tolan Tiga Indonesia – Perlabian Palm Oil Mill		
Address	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province – 21463 Indonesia		
Contact Name	Mr. Olivier Tichit		
Website	www.tolantiga.co.id	E-mail	ortichit@sipef.com
Telephone	+62 61 415 2043	Facsimile	+62 61 452 0908

2. Certification Information			
Certificate Number	RSPO 555208	Date of First Certification	17 May 2010
		Certificate Start Date	17 May 2015
		Certificate Expiry Date	16 May 2020
Scope of Certification	Production of crude palm oil and palm kernel at Perlabian palm oil mill with two (2) company-owned plantation namely Perlabian estate and Tolan estate. Mill capacity is 60 tonnes FFB/hour.		
Applicable Standards	RSPO P&C Indonesia National Interpretation, September 2016; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE101-17489433	ISCC EU	DQS-UL CFS GmbH	25 th November 2018

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01 100 106312	ISO 9001:2008	TUV Rheinland	14 th September 2018
01 104 106312	ISO 14001:2008	TUV Rheinland	14 th September 2018

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Perlabian POM	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia	100° 04' 57.19" E	02° 03' 40.98" N
Perlabian Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province	100° 04' 52.40" E	02° 03' 37.60" N
Tolan Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Regency, Sumatera Utara Province, Indonesia	100° 02' 30.66" E	02° 00' 11.78" N

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Perlabian Estate	4,354.24	59.38	393.40	4,807.02	90.58
Tolan Estate	3,614.15	55.99	1.90	3,672.04	98.42
Total	7,968.39	115.37	395.30	8,479.06	93.97

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Perlabian Estate	317.33	2,057.55	1,027.83	915.92	35.61	4,036.91	317.33
Tolan Estate	0	388.99	2,543.35	681.81	0	3,614.15	0
Total (ha)	317.33	2,446.54	3,571.18	1,597.73	35.61	7,651.06	317.33

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7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (May 2017 – Apr 2018)	Actual (May 2017 – Apr 2018)	Forecast (May 2018 – Apr 2019)
Perlabian Estate	105,688	100,548.17	103,259.95
Tolan Estate	105,180	102,153.52	105,759.61
Total	210,868	202,701.69	209,019.56

8. Certified Tonnage of FFB (from other certified unit(s))			
Estate	Tonnage / year		
	Estimated (May 2017 – Apr 2018)	Actual (May 2017 – Apr 2018)	Forecast (May 2018 – Apr 2019)
Nil	N/A		N/A
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)			
Independent FFB Supplier	Tonnage / year		
	Estimated (May 2017 – Apr 2018)	Actual (May 2017 – Apr 2018)	Forecast (May 2018 – Apr 2019)
Nil			
Total			

10. Certified Tonnage			
Mill Capacity: 60 MT/hr SCC Model: IP	Estimated (May 2017 – Apr 2018)	Actual (May 2017 – Apr 2018)	Forecast (May 2018 – Apr 2019)
	FFB	FFB	FFB
	210,868	202,701.69	209,019.56
	CPO (OER: 23%)	CPO (OER: 21.8%)	CPO (OER: 23.0%)
	48,500	44,234.51	48,074.50
	PK (KER: 5.5%)	PK (KER: 5.5%)	PK (KER: 5.5%)
11,598	11,243.65	11,496.08	

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11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	13,012	19,999	-	1,150.00	34,161

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	10,251.08	-	-	-	10,251.08

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	Nil	Nil
IS-CSPKO	Nil	Nil
IS-CSPKE	Nil	Nil

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: RSPO-ACC-19)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Singapore, Jakarta, Bangkok and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site initial assessment was conducted from **26-29 March 2018**. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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. RSPO Principles & Criterias Indonesia National Interpretation (INA NI) 2016 and RSPO Supply Chain Certification Standard, June 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates

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

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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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

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 (Re-certification)	Year 2 (ASA1_2)	Year 3 (ASA2_2)	Year 4 (ASA3_2)	Year 5 (ASA4_2)
Perlabian POM	x	X	x	x	x
Perlabian Estate	x	X	x	x	x
Tolan Estate	x	X	x	x	x

Tentative Date of Next Visit: March 25, 2019 - March 29, 2019

Total No. of Mandays: 14

2.2 BSI Assessment Team:

Team Member Name	Role	Qualifications <i>(Short description of the team members)</i>
Pratama Agung Sedayu (PS)	Team Leader/ Lead Auditor	He graduated from University of Jenderal Soedirman on 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor Endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor Endorsed Courses. During this assessment, he assessed on the aspects of estate and mill's best management practices, transparency, GHG, supply chain for CPO Mills audits. He is fluently speaking in English and Bahasa Indonesia.

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<p>Eko Purwanto (EP)</p>	<p>Auditor</p>	<p>He graduated as Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Agricultural University (IPB) in 2001. He owned working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implemented good agricultural practice including integrated pest management and limited pesticides uses. He has been trained for lead auditor of RSPO P&C (2013), ISO 9001:2008 (2012), ISO 14001:2004 (2013), ISPO (2012) and RSPO SCC (2012). He has also completed training course of ISO 14001 (2012), Minaut (Oil and Automotive) Indonesia (2011) and Introduction to HCV Toolkit HCV (2011). Since October 2012 he has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in Indonesia Sustainable Palm Oil (ISPO) and RSPO P&C audit for several plantations and mills, also RSPO Supply Chain audit for several KCP, Bulking and Refinery. During this assessment, he assessed on the aspects of estate best practices, environment audits.</p>
<p>Imam Fakhrurozi (IF)</p>	<p>Auditor/ Trainee Lead Auditor</p>	<p>Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011. He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2015. During this assessment, he assessed on the aspects of mill and estate best practices, environment and OHS.</p>
<p>Nanang Mualib (NM)</p>	<p>Auditor</p>	<p>He holds a Bachelor degree in Forestry Technology from Bogor Agriculture University, 1999. He has 4 years experience worked in the Forest plantation company in Indonesia, and has experiences involves in the several RSPO certification audits as team member. He has passed 5 days ISO 9001 auditor training on 2009. He has been approved as an HCV Assessor under RSPO Scheme. He has been involved in many assessment related to the Forestry and Sustainable oil palm certification in Indonesia. He has experienced involves in RSPO certification assessments more than 15 different oil palm organizations (including mills and estates) in Indonesia. He has passed the RSPO Lead Auditor Training in 2017. During this assessment, he assessed on the aspect of Legal, HCV identification and management audits, and also social community engagement and stakeholder consultation.</p>

Accompanying Persons:

No.	Name	Role
	<p>Nil</p>	

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	PS	EP	IF	NM

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			PRSP LA/ PRSP- SC	PRSP- EMS	PRSP- OHS/E MS	PRSP SA
Monday, 26/03/2018	08.00 – 08.30	Opening Meeting - Presentation by client (Overview of PT. Tolan Tiga Indonesia – Perlabian POM and its supply base); - Presentation by BSI team (Objective, scope, audit plan, etc.)	√	√	√	√
	08.30 – 12.00	Field Visit (Perlabian Estate): Field observation and Worker interview - FFB harvesting, FFB loading, road maintenance, IPM	√	-	-	-
		Field Visit (Perlabian Estate): Field observation and Worker interview - landfill (waste management), workshop, water management, etc.	-	√	-	-
		Field Visit (Perlabian Estate): Field observation and worker interview - Herbicide application programmes, fertilizer application, chemical and fertilizer warehouse, hazardous waste storage, etc.	-	-	√	-
		Field Visit (Perlabian Estate): Field observation and worker interview - HCV's, riparian zones, boundaries inspection, housing, social amenities, school, clinic, etc	-	-	-	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	(Perlabian Estate): RSPO Document Review General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 3, Principle 4),	√	-	-	-
		(Perlabian Estate): RSPO Document Review: RSPO P&C (for Principle 4, 5.4 – 5.6 and Principle 8)	-	√	-	-
		(Perlabian Estate): RSPO Document Review: RSPO P&C (for Principle 4.7, and Principle 5)	-	-	√	-
		(Perlabian Estate): RSPO Document Review: RSPO P&C (for Principle 1, Principle 2 and Principle 6)	-	-	-	√
Tuesday, 27/03/2018	08.00 – 12.00	(Perlabian POM): RSPO Document Review General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 3, Principle 4.1 and Principle 8), RSPO SCCS implementation	√	-	-	-
		(Perlabian POM): RSPO Document Review: RSPO P&C (for Principle 4, 5 and Principle 6)	-	√	-	-
		(Perlabian POM): RSPO Document Review: RSPO P&C (for Principle 4.1, 4.7, and Principle 5)	-	-	√	-
		(Perlabian POM): RSPO Document Review: RSPO P&C (for Principle 5 Principle 6)	-	-	-	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Field Visit (Perlabian POM): RSPO SCCS implementation	√	-	-	-
Field Visit (Perlabian POM): Visit and observing Best Management Practices, Interview with Perlabian POM workers,		-	√	-	-	

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Date	Time	Subjects	PS	EP	IF	NM
			PRSPOLA/ PRSPOSC	PRSPO- EMS	PRSPO- OHS/E MS	PRSPO SA
		Field Visit (Perlabian POM): Visit and observing Occupational Safety and Health management, Environmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc),	-	-	√	-
		Field Visit (Perlabian POM): Interview with Perlabian POM workers,	-	-	-	√
Wednesday, 28/03/2018	08.00 – 12.00	Field Visit (Tolan Estate): Field observation and Worker interview - FFB harvesting, FFB loading, road maintenance, IPM	√	-	-	-
		Field Visit (Tolan Estate): Field observation and Worker interview - landfill (waste management), workshop, water management, etc.	-	√	-	-
		Field Visit (Tolan Estate): Field observation and worker interview - Herbicide application programmes, fertilizer application, chemical and fertilizer warehouse, hazardous waste storage, etc.	-	-	√	-
		Stakeholder consultation: Visit and interview with government offices in Labuhan Batu Regency	-	-	-	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	(Tolan Estate): RSPO Document Review General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 3, Principle 4 and Principle 7),	√	-	-	-
		(Tolan Estate): RSPO Document Review: RSPO P&C (for Principle 4, 5.4 – 5.6 and Principle 8)	-	√	-	-
(Tolan Estate): RSPO Document Review: RSPO P&C (for Principle 4.7, Principle 5, Principle 6)		-	-	√	-	
		Stakeholder Consultation: Visit to local communities (head of village, cooperatives, community leader, contractors)	-	-	-	√
Thursday, 29/03/2018	08.00 – 12.00	(Perlabian POM/Perlabian Estate/Tolan Estate): RSPO Document Review Verification of outstanding information	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 15.30	(Perlabian POM/Perlabian Estate/Tolan Estate): RSPO Document Review Verification of outstanding information	√	√	√	√
	15.30 – 16.00	Report preparation	√	√	√	√
	16.00 – 16.30	Closing Meeting	√	√	√	√

Section 3: Assessment Findings

3.1 Details of audit results are provided in the following Appendix:

- SIPEF Group Time Bound Plan
- RSPO Supply Chain Certification Checklist June 2017
- RSPO P&C INA-NIWG 2016 Checklist

3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	PT. Tolan Tiga Indonesia is a subsidiary of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Comply
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Not all the estates and mills certified within five years after obtaining RSPO membership. New estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014.	Comply
Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	SIPEF Group's time bound plan is timely challenging. SIPEF Group has putting consideration on age of plantation, size of plantation as supply base with regards to location of palm oil mill in preparing the time bound plan.	Comply
Have there been any changes since the last audit? Are they justified?	Yes, there are changes in time bound plan compared to the latest annual surveillance assessment in PT. Tolan Tiga Indonesia. <ul style="list-style-type: none"> • PT. Agro Kati Lama, from 2019 to 2021; • PT. Agro Muara Rupit, from 2019 to 2024; • PT. Agro Rawas Ulu, from 2019 to 2024. • PT. Timbang Deli Indonesia, to be certified in 2018. For PT. Agro Kati Lama, PT. Agro Muara Rupit an PT. Agro Rawas Ulu - SIPEF Group provides sufficient explanation on the changes in implementation of timebound plan: SIPEF Group's latest projections stipulates that company will have enough crop to justify the building of the two mills by the year 2021 (for Kati Lama Mill) and 2024 (for Muara Rupit Mill), as indicated in the time-bound plan. The target years for the building of these mills have been set taking into consideration the current rate of planting in the three estates and plasma schemes that will consitute the supply base of the two mills. For PT. Timbang Deli Indonesia, a seed production	Comply

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	plantation, currently prepared as supply base to PT. Eastern Sumatra Indonesia and to be certified in 2018. Audit team accepted management explanation on the matter.	
If there have been changes, what circumstances have occurred?	The major cause of the changes is due to delay in land acquisition and starting of planting. The assessment team accepted the explanation.	Comply
Have there been any stakeholder comments?	<p>Yes. Stakeholder comments are noted.</p> <p>The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case Tracker; raised by the communities on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>The assessment team was also sought for additional evidences from PT. Agro Muara Rupit/SIPEF. Documented evidence demonstrated company has attend the complainant and invited the complainant to lodge a complaint/resolve the complaint through company complaint procedures.</p> <p>Company provides all documented evidence that the complaint was being responded in appropriate manners to resolve the complaint.</p>	Comply
Have there been any newly acquired subsidiaries?	The most recent acquisition was on 1 August 2017, PT. Dendymarker Indah Lestari – have been RSPO certified since 2015. The certification has been verified from the RSPO website.	Comply
If yes, have the newly acquisitions certified within a three-year timeframe?	The most recent acquisition was on 1 August 2017, PT. Dendymarker Indah Lestari – have been RSPO certified since 2015. The certification has been verified from the RSPO website.	Comply
Have there been any isolated lapses in implementation of the plan?	No isolated lapse. SIPEF Group provides adequate evidence related to changes in implementation of the plan.	Comply
Un-Certified Units or Holdings		

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	<p>As NPP has been conducted, it can be confirmed that there is no replacement of primary forest as the LUCA has been completed and accepted by RSPO.</p> <p>As part of the NPP, HCV assessment has been conducted and any HCV area requires to be maintained are stated in the management plan of the NPP.</p> <p>The company has carried out HCV assessment for scheme smallholders.</p>	Comply
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p>All new planting after January 1st, 2010 have undergone and complies with RSPO New Planting Procedure/RSPO NPP. RSPO NPP for PT. Agro Muara Rupit, PT. Agro Kati Lama, PT. Agro Rawas Ulu and PT. Timbang Deli Indonesia have been published in RSPO website.</p>	Comply
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>Yes. Stakeholder comments are noted.</p> <p>The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case Tracker; raised by the communities on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>The assessment team was also sought for additional evidences from PT. Agro Muara Rupit/SIPEF. Documented evidence demonstrated company has attend the complainant and invited the complainant to lodge a complaint/resolve the complaint through company complaint procedures.</p> <p>Company provides all documented evidence that the complaint was being responded in appropriate manners to resolve the complaint.</p>	Comply
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute</p>	<p>No labor dispute noted. The assessment team has conducted a search in internet to confirm that there is no new comments or dispute raised by the communities related to labor dispute on those units that have not been certified.</p>	Comply

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Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No non-legal compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities, related to legal non-compliance on those units that have not been certified.	Comply
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	The internal audit has been conducted for all uncertified units: <ul style="list-style-type: none"> • PT. Agro Muara Rupit was conducted on 13-15 March 2017; • PT. Agro Kati Lama was conducted on 20-21 February 2017; • PT. Agro Rawas Ulu was conducted on 27 February – 1 March 2017; PT. Timbang Deli Indonesia was conducted on 30 October – 3 November 2017;	Comply
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	As NPP has been conducted, it can be confirmed that there is no replacement of primary forest as the LUCA has been completed and accepted by RSPO. As part of the NPP, HCV assessment has been conducted and any HCV area requires to be maintained are stated in the management plan of the NPP. The company has carried out HCV assessment for scheme smallholders.	Comply

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	There was no obligation for PT. Tolan Tiga Indonesia to have scheme smallholder. PT. Tolan Tiga Indonesia does not received FFB from smallholders, therefore does not obliged to comply with the standard within three years of the mill's initial certification.	Comply

3.4 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A. During the Certification Assessment there were no Major or Minor nonconformities raised.

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Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	PT. Tolan Tiga Indonesia demonstrate good commitment regarding maintain system and record for RSPO SCCS for CPO Mills. Update consistent with RSPO Supply Chain Certification Standard, June 2017.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
NCR Ref #	Nil	Clause & Category (Major / Minor)	
Closed (Yes / No)		Date of nonconformity Closure	
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>Indicator 4.6.7: Fertilizer warehouse and chemical store in estates have been prepared with Material Safety Data Sheet/MSDS. Based on interview with chemical storekeepers, the understanding for emergency situation is sufficient. Emergency situation being simulated during the interview related to chemical/fertilizer expose to the eye/soft tissue. Chemical storekeeper was able to explain the first aid treatment, through flushing with flowing clean water for minimum 15 minutes. Chemical storekeeper has been able to point out the only eye wash is available near the premise and it's working. However, it appeared that location of eye wash was distant from risked area. Area of concern relates to whether eye wash are being suitably sufficient and located for emergency situation in the area.</p> <p>Action Plan: Auditor team has observation visit in fertilizer warehouse and chemical storage in Perlavian Estate and Tolan Estate, there were found the Estates has installed the eye wash are being suitably sufficient and located for emergency situation in the area. Based on interview with chemical storekeepers, they have attended the training related to handling of pesticides and Material Safety Data Sheet/MSDS, e.g: Training on MSDS (material safety data sheet),</p>

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	<p>dated 23 November 2017 location in Perlabian Estate, attended by spraying applicator, supervisor and chemical storage officer.</p> <p>The Estates also has prepared the methods that minimize risk and negative impacts of chemical handling, e.g: Provided the first aider in warehouse fertilizer and Calibration of spraying equipment (SA15), location at mixing area in Tolan Estate, dated 21 February 2018.</p> <p>The observation has been followed up with effective corrective action</p>
OFI 2	<p>Indicator 4.7.5:</p> <p>In Perlabian POM, the mill management has prepared tool and equipment such as fire hydrant, in the case of fire emergency situation. There are three points of fire hydrant in mill compound; in loading ramp, pressing station and biogas plant. The use of fire hydrant was bwing simulated during visit to mill. It was observed during the assessment that access to key, required for opening hydrant lock, was posing difficulty to the operation in its timely retrieval. However, the hydrant was successfully operating. This may reflect on emergency team's general ability to react to ensure emergency fire fighting equipment is ready-to-use, where and when it is needed, through timely retrieval.</p> <p>Action Plan:</p> <p>Palm oil mill and estates have been implementing the fire equipment inspection as planned in P2K3 Program (monthly). The inspection to ensure emergency fire fighting equipment is ready-to-use, where and when it is needed. e.g:</p> <ul style="list-style-type: none"> - "Daftar Periksa Kotak Hydrant – Perlabian POM", in March 2017 for hydrant No 1, No 2. - Formulir Pemeriksaan Alat Pemadam Kebakaran (APAR) – Perlabian Estate, month March 2018, location in fuel station, central workshop, chemical storage, policlinic, office. <p>The organization also has conducted the simulation of emergency preparedness respon (fire drill), dated 10 February 2018. The evidencet verified: scenario, attendance list, photograph.</p> <p>The observation has been followed up with effective corrective action.</p>

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	CATEGORY (MAJOR/ MINOR)	ISSUED	STATUS & DATE (Closure)
032936M0	Major	15 March 2014	Closed on 14 May 2014
1032936M16	Major	15 March 2014	Closed on 14 May 2014
1032936M27	Major	15 March 2014	Closed on 14 May 2014
1032936N1	Minor	15 March 2014	Closed on 1 April 2015
1032936N11	Minor	15 March 2014	Closed on 1 April 2015
1032936N25	Minor	15 March 2014	Closed on 1 April 2015
1032936N26	Minor	15 March 2014	Closed on 1 April 2015
1032936N28	Minor	15 March 2014	Closed on 1 April 2015
1149548M1	Major	1 April 2015	Closed on 5 May 2015
1174416N1	Minor	1 April 2015	Closed on 16 March 2016
1149548N1	Minor	1 April 2015	Closed on 16 March 2016
1304318N1	Minor	16 March 2016	Closed on 23 February 2017

3.5. Stakeholders 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 Perlabian Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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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.

List of Stakeholders Contacted	
Internal Stakeholders Komite Gender PT. Tolan Tiga Indonesia – Gender Committee	Union/Contractors/Local Communities Pengurus Serikat Pekerja PT. Tolan Tiga Indonesia – Worker Union Meranti Village Communities Pekan Tolan Village Communities
Government Departments Dinas Tenaga Kerja Kabupaten Labuhan Batu Selatan – Manpower Office Dinas Lingkungan Hidup Kabupaten Labuhan Batu Selatan – Environment Office Dinas Perkebunan dan Peternakan Kabupaten Labuhanbatu Selatan – Plantation and Husbandry Office Kantor Pertanahan Kabupaten Labuhan Batu – Lands Office	NGO LSM Tim 10 - NGO

IS #	Description
1	<p>Feedbacks: Dinas Tenaga Kerja Kabupaten Labuhanbatu Selatan – Manpower Office</p> <ul style="list-style-type: none"> - The office has not received any negative issue on industrial relationship in PT. Tolan Tiga Indonesia; - In the past 1 years, there have been no industrial relation dispute in PT. Tolan Tiga Indonesia; - PT. Tolan Tiga Indonesia have collective work agreement approved in 2017 valid until 8 January 2019; - PT. Tolan Tiga Indonesia have consistently reports the manpower; - PT. Tolan Tiga Indonesia have paid the minimum wage as required by regulation; - PT. Tolan Tiga Indonesia have registered all workers into BPJS Ketenagakerjaan and BPJS Kesehatan. All workers have been provided with medical check up; - The manpower office expecting PT. Tolan Tiga Indonesia to encourage the third parties whose partnering with company, to fulfil the industrial obligation to Manpower Office; such as: report of manpower use, implementation of minimum wage, BPJS (insurance), and permit. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia acknowledge the positive inputs and will continue to implement the obligation according with applicable regulations.

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	<ul style="list-style-type: none"> - With regards to the third party vendor, PT. Tolan Tiga Indonesia will encourage their third parties to report their manpower use, implementation of minimum wage, BPJS (insurance) and permits to Manpower Office of Labuhan Batu Selatan Regency. In addition, company have issued a memorandum pertaining the matter to PT. SSI and Koperasi Jasa Karyawan. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted. - Audit team have verified the company follow up to control the third party manpower supplier.
<p>2</p>	<p>Feedbacks: Dinas Lingkungan Hidup Kabupaten Labuhanbatu Selatan – Environment Office</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia have issued with environment permit; - PT. Tolan Tiga Indonesia have regularly report the environment management performance; - PT. Tolan Tiga Indonesia have permits for hazardous waste storage and regularly reports the management of hazardous waste; - Environment office received reports from community related to the maintenance of boundary trench, adjacent to community's housing. The concerns related to potential hazard of felling into trench and inundated water that may causing mosquito. - Company expected to manage the HCV by planting local species tree such as <i>Meranti, Jelutung, Tengkawang, Damar</i>. - Company expected to add the monitoring of soil quality including microbiology as per "Peraturan Pemerintah No.150 tahun 2000". <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia acknowledged the positive inputs and will continue reporting the environment management performance to environment office (DLH). - PT. Tolan Tiga Indonesia have addressed the concerns related to maintenance of boundary trench, by preparing risk assessment, putting up hazard signboards and managing the waste disposal as to avoid mosquito nesting in trench. Company have prepared plan to erect additional signboards to prohibit disposal of waste into trench and hazard signboards/deep trench. - PT. Tolan Tiga Indonesia have treated the HCV area by enrichment of species. Company will take the input, and implement local timber species as per HCV Management Plan 2018. - PT. Tolan Tiga Indonesia follows up the input from environment office related to additional soil microbiology parameter as per "Peraturan Pemerintah No.150 tahun 2000". <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted. - Audit team have verified the existing management plan and improvement plan related to comments from Environment office: concerns related to health and safety aspect from boundary trench maintenance; enrichment HCV area with local timber species; additional soil microbiology parameter monitoring. The existing management plans and follow up action plans are sufficient.
<p>3</p>	<p>Feedbacks: Dinas Perkebunan dan Peternakan Kabupaten Labuhanbatu Selatan – Plantation and Husbandry Office</p> <ul style="list-style-type: none"> - There has been no significant issues related to plantation management, however plantation office received reports from community related to the maintenance of boundary trench, adjacent to community's housing. The concerns related to potential hazard of felling into trench and inundated water that becomes breeding spot for mosquito. - PT. Tolan Tiga Indonesia have consistently reports "Laporan Perkembangan Usaha Perkebunan (LPUP)" each semester. - No land dispute case noted. - PT. Tolan Tiga Indonesia have been issued with "Kelas Kebun II". <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia acknowledged the positive inputs and will continue reporting the plantation management performance to plantation and husbandry office. - PT. Tolan Tiga Indonesia have addressed the concerns related to maintenance of boundary trench, by

	<p>preparing risk assessment, putting up hazard signboards and managing the waste disposal as to avoid mosquito nesting in trench. Company have prepared plan to erect additional signboards to prohibit disposal of waste into trench and hazard signboards/deep trench.</p>
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted. - Audit team have verified the existing management plan and improvement plan related to comments from Environment office: concerns related to health and safety aspect from boundary trench maintenance; enrichment HCV area with local timber species; additional soil microbiology parameter monitoring. The existing management plans and follow up action plans are sufficient.
<p>4</p>	<p>Feedbacks: Kantor Pertanahan Kabupaten Labuhan Batu – Lands Office</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia does not have any case of land dispute with other party, including with surrounding community. - There was no indication of abandoned land in PT. Tolan Tiga Indonesia. - PT. Tolan Tiga Indonesia have maintained their HGU poles on boundary. <p>Management Responses: PT. Tolan Tiga Indonesia acknowledge the positive comments and will continue to maintain a good communication with lands office.</p> <p>Audit Team Findings: Positive comments.</p>
<p>5</p>	<p>Feedbacks: Pengurus Serikat Pekerja PT. Tolan Tiga Indonesia – Worker Union</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia and the worker union have collective work agreement approved in 2017 valid until 8 January 2019; - Meeting between worker union and company carried out every month. - Company has implemented minimum wage in 2017, as in "Upah Minimum Sektoral Kabupaten" for salary payment standard. Company has asked worker union for meeting on minimum wage 2018; - Company has registering all worker under "BPJS Ketenagakerjaan" and "BPJS Kesehatan" for insurance; - Company has provided facility for the worker, housing with clean water and electricity, medical clinic, school bus, religious house, sport facility. - Company provides the facility for the worker including clean water. However, lately worker feels the clean water condition was not suitable for cooking. - There has been no case of industrial relation dispute between employees and company; - Company has communicated the OHS plan; provided medical check up on annual basis; provided PPE for each risk; provided working tool as appropriate; provided onsite first aid kit; - Company has communicated the complaint and grievance settlement mechanism. - Company has communicated the policy on protection of flora and fauna, as well as high conservation value area; <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia acknowledge the positive comment and will continue to improve. - PT. Tolan Tiga Indonesia have tested the water quality from well. The latest water quality test dated 20 December 2017 and the test result complies with government required parameter for clean water under Peraturan Menteri Kesehatan No.416 tahun 1990. Nonetheless, company will continue to monitor and improve clean water supplied to worker. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted. - Audit team have verified the water analysis result from well. The result confirmed to meet government parameter. Audit team will review the progress during subsequent visit.
<p>6</p>	<p>Feedbacks: Komite Gender PT. Tolan Tiga Indonesia – Gender Committee</p> <ul style="list-style-type: none"> - Gender committee has been established. The regular program is monthly meeting.

	<ul style="list-style-type: none"> - No sexual harassment case and/or violence case noted and/or recorded up to date. - Company has implementing the female worker’s right such as regular medical checkup for female sprayers, menstrual leave right, maternal leave and breast-feeding leave, gender equality in payment. - Company has conveyed the mechanism for complaint and grievance settlement for any sexual harassment case. - There are more company policy’s dissemination in 2017. <p>Management Responses: PT. Tolan Tiga Indonesia will continue the good practice with regards to gender equality treatment.</p> <p>Audit Team Findings: Positive comments.</p>
<p>7</p>	<p>Feedbacks: Meranti Village Communities</p> <ul style="list-style-type: none"> - The communication between company and local communities are good. However, lately company response was delayed in terms of request for heavy machinery aid. - Meranti village expects company to develop again economy empowerment in form of husbandry program. - Meranti village feels lately no work vacancy not being communicated to village authority. Landowners received compensation on 2009 for 23 Ha; - Meranti village feels the access to plantation was limited. - There once land claim to PT. Tolan Tiga Indonesia. However, no more land claim – currently. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia will provide the aid in form of heavy machinery. However, the use of heavy machinery was come with sequence, this includes request from other villages. - Company will facilitate information dissemination for husbandry program by inviting resource person from Plantation and Husbandry Office. - PT. Tolan Tiga Indonesia admitted currently work vacancy is limited, because the plantation operation is already stabile. However, worker’s children from surrounding community will be priority. - The policy on access have been disseminated and have agreement. Company allowed access for motorcycle to be used by surrounding community. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team have verified the CSR plan from PT. Tolan Tiga Indonesia, confirmed planning for economy empowerment. - There has not been any job vacancy advertising, confirmed. Audit team have verified the composition of manpower/work force in PT. Tolan Tiga Indonesia, most of the worker comes from surrounding village. - Audit team observed the traffic/road access used by surrounding communities in Perlabian Estate and Tolan Estate. Audit team noted that the security screening was strict, however the use of motorcycle was not limited. - Audit team will review the progress during subsequent visit.
<p>8</p>	<p>Feedbacks: Pekan Tolan Village Communities</p> <ul style="list-style-type: none"> - Communication between village and PT. Tolan Tiga Indonesia was good. However, lately company response was delayed. - Community expects PT. Tolan Tiga Indonesia could give attention by helping community to prevent annual flooding by providing drainage maintenance in village. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia planned to disseminate again the communication channel and procedure to all stakeholders. - PT. Tolan Tiga Indonesia will review the provision of drainage maintenance for Pekan Tolan Village and provide assistance. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted.

	<ul style="list-style-type: none"> - Audit team noticed similar comment related to communication. Audit team have verified the communication and information request record; company plan to improve the situation. Audit team concluded company consistently received and responded all type of communication/consultation/information request. However, audit team will review the progress during subsequent visit.
<p>9</p>	<p>Feedbacks: LSM Tim 10 - NGO</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia was expected to encourage the "Program Bina Lingkungan" that with emphasize on local economy empowerment. - PT. Tolan Tiga Indonesia have done and implement good things such as donation to surrounding villages including education, infrastructure, heavy machinery aid, social and religious activities. - Communication between PT. Tolan Tiga Indonesia and the surrounding village, NGO and media needs to improve. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia have carried out the CSR program, including economy empowerment. But company planned to further conduct training/dissemination for local community economy empowerment. - PT. Tolan Tiga Indonesia acknowledge the positive comments. - PT. Tolan Tiga Indonesia planned to disseminate again the communication channel and procedure to all stakeholders. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted. - Audit team have verified the CSR plan from PT. Tolan Tiga Indonesia, confirmed planning for economy empowerment. - Audit team noticed similar comment related to communication. Audit team have verified the communication and information request record; company plan to improve the situation. Audit team concluded company consistently received and responded all type of communication/consultation/information request. However, audit team will review the progress during subsequent visit.

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Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT. Tolan Tiga Indonesia – Perlabian POM has complied with the RSPO P&C Indonesia National Interpretation, September 2016 and RSPO Supply Chain Certification Standard, June 2017 and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of PT. Tolan Tiga Indonesia – Perlabian POM is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Pratama Agung Sedayu	Name: Mr. Olivier Tichit
Company Name: on behalf BSI Malaysia Services Sdn Bhd.,	Company Name: PT. Tolan Tiga Indonesia – Perlabian POM
Title: Lead Auditor	Title: Director
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> 
Date: 29 March 2018	Date: 29 March 2018

Appendix A: Summary of Findings RSPO P&C Indonesia National Interpretation, September 2016

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available. - Minor compliance -	<p>PT. Tolan Tiga Indonesia has a procedure for receiving and responding to inquiry and/or information request as in "Prosedur Pemberian Tanggapan terhadap Permintaan Informasi No.ENC/SOP/08" dated 6 April 2015. The procedure stated that responsible to receive and respond to information is manager unit and field assistant – in accordance to their authority. The information recorded into "Buku Rekaman Permintaan Informasi dan Jawaban".</p> <p>Information received in form of letter, fax, email, or verbally. For verbal communication, recorded under "Buku Permintaan Informasi yang disampaikan secara lisan".</p> <p>List of information available for public: health and safety program, management and monitoring plan for SEIA, HCV, Pollution mitigation plan, continuous improvement plan, public summary from CB, all company policies;</p> <p>The procedure stated, initial response provided in seven (7) working days by unit manager; an additional three (3) working days if the information inquiry requires General Manager Office or department head authorization. A maximum twenty five (25) working days – at the latest (after information request accepted by unit) if the inquiry requires Board of Director authorization.</p> <p>Few documents categorized as confidential document: Data that if publish may have detriment effect to company operation, or private information, or information related to presence of RTE species – that if publish may increase the risk of hunting/poaching, or sacred places that want to be preserved by community, or ongoing dispute (within or outside legal mechanism) which may have negative impact to all parties.</p> <p>Perlabian Estate has identified and determined document that available for public, as in "Dokumen-dokumen yang tersedia untuk Umum" dated 30 January 2018. The list consist of:</p> <ul style="list-style-type: none"> - "Pemberian Hak Guna Usaha PT. Tolan Tiga Indonesia No.80/HGU/BPN/97" year 1997 – decree for land title issuance; - "Surat Pendaftaran Usaha Perkebunan sebagai Izin 	Comply

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Usaha Perkebunan No.213/Menhutbun-VII/2000” year 2000 – Plantation Business Registration;</p> <ul style="list-style-type: none"> - “Sertifikat Tanda Bukti Hak BPN No.02 tanggal 17 September 1997” year 1997 – Land certificate; - “Analisis Mengenai Dampak Lingkungan/ANDAL No.49/RKL-RPL” – Social and Environmental Impact Assessment; - “Penyajian Evaluasi Lingkungan” – Environment document; - “Rencana Pengelolaan Lingkungan/RKL No.49/RKL-RPL” year 2006 – environment management plan; - “Rencana Pemantauan Lingkungan/RPL No.49/RKL-RPL” year 2006 – environment monitoring plan; - “Kelayakan Lingkungan Hidup Adendum ANDAL PT. Tolan Tiga Indonesia No.660/55/BLH/2/2016” year 2016 – Environmental document - addendum; - “Izin Lingkungan NO.503/981/BPPTPM-LS/PI/2016” year 2016 – environmental permit; - “Penilaian NKT/HCV PT. Tolan Tiga Indonesia, Perlamban Estate” year 2009 – by YASBI; - “Laporan Penilaian Dampak Sosial dan Lingkungan” by YASBI year 2010 – SEIA; - “Izin Pengkajian Pemanfaatan Air Limbah Industri Minyak Sawit pada Tanahdi PKS PT. Tolan Tiga Indonesia No.503/641/BPPTPM-LS/P.I/2016” year 2016 – land application permit; - “Izin Tempat Penyimpanan Sementara Limbah B3 No.503/319/BPPTPM-LS/P.I/2015” year 2015 – permit for hazardous waste storage; - “Program Kesehatan dan Keselamatan Kerja” – health and safety plan; - “Rangkuman Publik dan Laporan Hasil Sertifikasi” – Public Summary from CB; - “Kebijakan-kebijakan Perusahaan” – Company Policies; - “Rekaman Keluh Kesah Internal dan Eksternal” – internal and external grievance record. - “Rencana Pengurangan dan Pencegahan Polusi” – Pollution mitigation and precention plan; - “Prosedur Ganti Rugi Lahan” – land compensation procedure; - “Rencana Perbaikan Berkelanjutan” – continuous improvement plan; - “Laporan Community Development/CSR – CSR and community development report”; - “Laporan-laporan Pelaksanaan RKL/RPL setiap semester” – Report of Environmental management and monitoring; - “Ijin Pengambilan Air Bawah Tanah” – ground water extraction permit. <p>Perlamban POM has identified and determined document that available for public, as in “Dokumen-dokumen yang Tersedia untuk Umum” dated 1 March 2018. The list consist of:</p> <ul style="list-style-type: none"> - “Izin Usaha Tetap (IUT) atas nama PT. Tolan Tiga Indonesia sesuai Keputusan Menteri Negara 	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Investasi/Kepala Badan Koordinasi Penanaman Modal No.394/T/Kehutanan-Perkebunan/1998” year 1998 – business permit;</p> <ul style="list-style-type: none"> - “Surat Pendaftaran Usaha Perkebunan sebagai Izin Usaha Perkebunan atas nama PT. Tolan Tiga Indonesia sesuai Keputusan Menteri Kehutanan dan Perkebunan No.213/Menhutbun-VII/2000 – plantation business permit; - “Sertifikat Tanda Bukti Hak No.2” year 1997 – land title; - “Revisi Dokumen Rencana Pengelolaan Lingkungan (RKL) dan Rencana Pemantauan Lingkungan (RPL) No.660/242/BPDL-LB/Set/2006” year 2006 – Environmental management and monitoring matrix; - “Penyajian Evaluasi Lingkungan (PEL)” year 1994; - “Izin Penyimpanan Sementara Limbah B3 PT. Tolan Tiga Indonesia Kebun/PKS Perlabian No.503/319/BPPTPM-LS/P.I/2015” year 2015 – permit for hazardous waste storage; - “Laporan-laporan Pelaksanaan RKL/RPL setiap semester” – Report for environmental management and monitoring plan implementation; - “Program Kesehatan dan Keselamatan Kerja” – OHS Plan; - “Rencana Perbaikan Berkelanjutan” – Continuous Improvement Plan; - “Kebijakan-kebijakan Perusahaan” – Company policies; - “Rencana Pengurangan dan Pencegahan Polusi” – Pollution prevention plan; - “Rangkuman Publik dan Laporan Hasil Sertifikasi” – Public Summary from CB; - “Rekaman Keluh Kesah Internal dan Eksternal” – Internal and external grievance record. 	
<p>1.1.2</p> <p>Records of requests for information and responses to the information requested shall be available.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>Each management unit have recorded request for information. In Perlabian POM records all information inquiry under logbook “Rekaman Permintaan Informasi & Tanggapan”. In 2017 there were 12 information request; and in period January – March 2018, there were 4 information requests. Sample seen:</p> <ul style="list-style-type: none"> - Incoming letter from “Dinas Tenaga Kerja No.560/145/Naker/VII/2017” dated 25 July 2017 related to invitation for technical guidance. The letter received on same date. Perlabian POM manager sends Mr. Roy Silaen, and representative from SPTTM. The team attended the meeting on 28 July 2017. <p>In Perlabian Estate, the information request and response recorded under “Rekaman Permintaan Informasi dan Tanggapan”. There were 8 information request for Perlabian Estate, period January – December 2017. There was 3 information request for period January – March 2018. Sample taken: Incoming letter from “Sekolah Tinggi Ilmu Pertanian (STIPER Labuhan Batu) – Program Studi Agro</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Teknologi” No010/AGR/STIPERLB/V/2017 dated 29 May 2017, related to proposal for student’s research. Response provided with approval. The letter received by Estate on 30 May 2017. Estate Manager was reporting and informing to General Manager Office, through letter No.180/PLE/2017 dated 31 May 2017. The approval letter send from General Manager HRA Department, to approve the proposal for reasearch through letter No.128/2017 dated 8 June 2017.</p> <p>Another logbook was recording the verbal communication as in “Buku Permintaan Informasi yang Disampaikan Secara Lisan”. Sample taken: local village requesting for grass cutting, dated 23 February 2017. Estate manager approved and responded by sending Grass mower team on 23 February 2017.</p>	
<p>Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>		
<p>1.2.1</p>	<p>Publicly available documents shall include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> a) Land titles/user rights (Criterion 2.2) b) Occupational health and safety plans (Criterion 4.7) c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8) d) HCV documentation (Criteria 5.2 and 7.3) e) Pollution prevention and reduction plans (Criterion 5.6) f) Details of complaints and grievances (Criterion 6.3) g) Negotiation procedures (Criterion 6.4) h) Continual improvement plans (Criterion 8.1) i) Public summary of certification assessment report j) Human Rights Policy (Criterion 6.13). <p>- Major Compliance -</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Public Summary from CB;</p> <ul style="list-style-type: none"> - "Rekaman Keluh Kesah Internal dan Eksternal" – Internal and external grievance record. <p>Perlabian Estate has identified and determined document that available for public, as in "Dokumen-dokumen yang tersedia untuk Umum" dated 30 January 2018. The list consist of:</p> <ul style="list-style-type: none"> - "Pemberian Hak Guna Usaha PT. Tolan Tiga Indonesia No.80/HGU/BPN/97" year 1997 – decree for land title issuance; - "Surat Pendaftaran Usaha Perkebunan sebagai Izin Usaha Perkebunan No.213/Menhutbun-VII/2000" year 2000 – Plantation Business Registration; - "Sertifikat Tanda Bukti Hak BPN No.02 tanggal 17 September 1997" year 1997 – Land certificate; - "Analisis Mengenai Dampak Lingkungan/ANDAL No.49/RKL-RPL" – Social and Environmental Impact Assessment; - "Penyajian Evaluasi Lingkungan" – Environment document; - "Rencana Pengelolaan Lingkungan/RKL No.49/RKL-RPL" year 2006 – environment management plan; - "Rencana Pemantauan Lingkungan/RPL No.49/RKL-RPL" year 2006 – environment monitoring plan; - "Kelayakan Lingkungan Hidup Adendum ANDAL PT. Tolan Tiga Indonesia No.660/55/BLH/2/2016" year 2016 – Environmental document - addendum; - "Izin Lingkungan NO.503/981/BPPTPM-LS/PI/2016" year 2016 – environmental permit; - "Penilaian NKT/HCV PT. Tolan Tiga Indonesia, Perlabian Estate" year 2009 – by YASBI; - "Laporan Penilaian Dampak Sosial dan Lingkungan" by YASBI year 2010 – SEIA; - "Izin Pengkajian Pemanfaatan Air Limbah Industri Minyak Sawit pada Tanahdi PKS PT. Tolan Tiga Indonesia No.503/641/BPPTPM-LS/P.I/2016" year 2016 – land application permit; - "Izin Tempat Penyimpanan Sementara Limbah B3 No.503/319/BPPTPM-LS/P.I/2015" year 2015 – permit for hazardous waste storage; - "Program Kesehatan dan Keselamatan Kerja" – health and safety plan; - "Rangkuman Publik dan Laporan Hasil Sertifikasi" – Public Summary from CB; - "Kebijakan-kebijakan Perusahaan" – Company Policies; - "Rekaman Keluh Kesah Internal dan Eksternal" – internal and external grievance record. - "Rencana Pengurangan dan Pencegahan Polusi" – Pollution mitigation and precention plan; - "Prosedur Ganti Rugi Lahan" – land compensation procedure; - "Rencana Perbaikan Berkelanjutan" – continuous improvement plan; - "Laporan Community Development/CSR – CSR and community development report"; 	

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	<ul style="list-style-type: none"> - "Laporan-laporan Pelaksanaan RKL/RPL setiap semester" – Report of Environmental management and monitoring; - "Ijin Pengambilan Air Bawah Tanah" – ground water extraction permit; 	
<p>Criteria 1.3:</p>		
<p>Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions along with the documentation of socialisation process of the policy to all levels of the workers and operations.</p> <p>- Minor compliance –</p>	<p>Company has a policy for code of conduct, under "Code of Conduct" signed by President Director, on 17 December 2014. The code of conduct consist of internal guidance on good corporate governance, also cover work ethics – basic individual attitude, individual behaviour inside and outside of company; conduct as supervisor, behaviour as subordinate.</p> <p>Commitment to specific things: Company records, documents, and information should be accountable, accurate and timely; All individuals to realize the responsibility to secure company's assets; To never tolerance insider trading in accordance with applicable regulations; all individual to avoid conflict of interest; Regulating gifts, souvenirs, donations, commission, bribery.</p> <p>In Perlabian Estate, the dissemination of code of conduct policy, minimum age policy, gender equality at Division IV, dated 22 March 2018: For 17 harvesters and the mandor (Mr. Tu*****, Mr. Suh*****, Mr. Tu****o, and other workers); 2 tally clerk (Mr. Jo***** G*****); Record sighted: Muster Chit Field Work dated 22 March 2018, Attendance and Work Allocation dated 22 March 2018 for Division IV.</p> <p>Another dissemination of code of conduct policy, prohibit drug and alcohol abuse policy, prohibit forced labor policy, and prohibiting sexual harassment policy at Division II, dated 12 March 2018: For 15 harvesters and 1 mandor; 1 kindergarten teacher; 1 elementary school teacher; 1 water supply operator; 1 creche keeper; 12 manuring worker and 1 mandor; 2 black bunch census workers. Record sighted: Muster Chit Field Work dated 12 March 2018, Attendance and Work Allocation dated 12 March 2018 for Division II.</p> <p>While in Perlabian POM, dissemination of code of conduct policy to Perlabian POM worker, dated 25 February 2017 for 26 workers. Sampled worker: Mr.S**** Sih***** (mandor), Mr.E** S***** (Boiler), Mr. Gun**** (unstripped bunch station), Mr.Ik**** (Sterilizer), Mr.A*** L***** (claybath station), Mr.S***** Adh*** (hoisting crane).</p> <p>Latest dissemination of code of conduct policy carried ou 21 March 2018, during morning muster, for 22 workers in Perlabian POM. Sampled worker: Mr.S**** Sih***** (mandor), Mr.E** S***** (Boiler), Mr. Gun**** (unstripped bunch station), Mr.Ik**** (Sterilizer), Mr.A*** L***** (claybath station), Mr.S***** Adh*** (hoisting crane).</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
Principle 2: Compliance with applicable laws and regulations		
Criterion 2.1:		
There is compliance with all applicable local, national and ratified international laws and regulations.		
2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance –	PT. Tolan Tiga Indonesia has demonstrated the document relevant legal requirement, such as: 1. Land Title Right documents: - Hand over Agreement between Indonesian Government and Societe Internationale de Plantations Et de Finnance S.A-SIPEF (Belgium), dated 19 April 1968 for 3,000 Ha and 7,031.27 Ha - "Risalah Pemeriksaan Tanah dari Panitia "B" No. 40/PPT/B/69", dated 17 December 1968 and "Risalah Pemeriksaan Tanah dari Panitia "B" No. 48/PPT/B/71", dated 7 December 1971. - "Fatwa Tata Guna Tanah berdasarkan Surat Kepala Inspeksi Badan Pertanahan Nasional Sumatera Utara", dated 18 April 1970. - Land Title rights (HGU) from Badan Pertanahan Nasional/BPN (National Land Body) No.SK.80/HGU/DA/97, dated 16 July 1997 (6,042.44 Ha), consist of 4,807.02 Ha (Perlabian Estate) dan 1,235.42 Ha (Tolan Estate). - Land title rights (HGU) from BPN (National Land Body) No.86/HGU/BPN/97, dated 23 July 1997 (2,436.62 Ha) for Tolan Estate. 2. Social and Environment documents - SEIA and environmental permit in form of "Surat Keputusan Menteri Pertanian Republik Indonesia No.RC.220/472/B/III/1994 tentang Penyajian Evaluasi Lingkungan/PEL Perkebunan Kelapa Sawit, Karet dan Kakao serta Pabrik Kelapa Sawit dan Pabrik Sheet Rubber Kebun Perlabian Group, Kabupaten Labuhan Batu, Propinsi Sumatera Utara", dated 17 March 1994. - Renewal SEIA (AMDAL) was approved by "Surat Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Labuhan Batu No. 660/328/BPDL-LB/Set/2006", dated 21 July 2006. 3. The other document of legal requirement: - The last renewal "Ijin Usaha Tetap-IUT No. 394/T/Kehutanan-Perkebunan/1998", dated 21 Agustus 1998, for 8,479.06 Ha. - "Surat Pendaftaran Usaha Perkebunan (Operational Busines permit) No. 213/Menhutbun-VII/2000", dated 10 March 2000 for 8,479.06 Ha with Mill capacity 75 tonnes FFB/hour and Mill capacity permit 60 tonnes FFB/hour. - Water extraction permit – "Izin Pengusahaan Sumber Daya Air No.610/38/DIS PM PPTSP/6/XI.1/I/2018", dated 9 January 2018.	Comply

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Criterion / Indicator	Assessment Findings	Compliance
	<p>The permit valid until 8 Januari 2021.</p> <ul style="list-style-type: none"> - Permit for machineries: Perlabian Mill has list of machineries: Boiler (2 units), Hosting Cranes (4 units), Sterilizer (5 units), Genset (4 units), Turbine Steam (4 units). The list of mil machineries is documented in "Evaluasi Rekaman pemenuhan, 2016 – Perlabian POM". Akte Izin is available, e.g.: "Izin Bejana Uap - Sterilizer No.1 No.678/62.09/2006; "Izin Bejana Uap - Sterilizer No.2, No.02/1.0056.A tahun 1990"; "Izin Turbine No.1, No.275/PTP/W2/1996"; "Izin Turbine No.2, No.273/PTP/W2/1996". - The mil machineries inspection was conducted regularly from "Pengawas keselamatan Kerja, Dinas Tenaga Kerja Kabupaten Labuhan Batu Selatan". The last inspection for "Izin Bejana Uap, Sterilizer No.2" was conducted on 13 March 2017 (the next inspection 13 March 2021), reguler inspection every 4 years. - The latest inspection of Turbine no. 4 was conducted on 7 July 2017, the next inspection on 7 July 2018, reguler inspection shall conducted annually. - Collective work agreement – "Perjanjian Kerja Bersama (PKB)" between PT. Tolan Tiga Indonesia with the worker union, "Serikat Pekerja Tolan Tiga Mandiri/SPTTM" has been approved by "Kepala Dinas Tenaga Kerja Provinsi Sumatera Utara" through "Surat Keputusan Kepala Dinas Tenaga Kerja Provinsi Sumatera Utara No.27-6/DTK-TR/2017" dated 25 January 2017 and valid until 8 January 2019. 	
<p>2.1.2</p> <p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <ul style="list-style-type: none"> - Minor compliance – 	<p>PT. Tolan Tiga Indonesia has established procedure related effort to comply with changes in the regulation as regulated in SOP No. CA/SOP/01, dated 1 November 2011.</p> <p>In 2018, the company has indentified 232 regulations, including ratified convention, e.g.:</p> <ul style="list-style-type: none"> - "Undang-Undang No.11 tahun 2005 tentang Ratifikasi International Covenant on Economic, Social and Cultural Rights (ICCPR)", - "Undang-Undang No.12 Tahun 2005 tentang Ratifikasi International Covenant on Civil and Political Rights (ISSPR); - "Undang-Undang No.17 Tahun 2004 tentang Pengesahan Kyoto Protocol to the United National Framework Convention on Climate Change"; - "Undang-Undang No.21 Tahun 2003 tentang pengesahan ILO Convention No.81 Concerning Labour inspection in industry and commerce"; - "Undang-Undang No.1 Tahun 2000 tentang Ratifikasi Konvensi ILO No.182 mengenai Pelarangan dan tindakan segera penghapusan bentuk bentuk pekerjaan terburuk untuk anak". <p>New regulation, such as:</p>	<p>Comply</p>

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	<p>- "Peraturan Menteri Pertanian No.5 tahun 2018 tentang Pembukaan dan/atau Pengolahan Lahan Perkebunan Tanpa Membakar sebagai Pengganti Peraturan Menteri Pertanian No. 47 tahun 2014 tentang Brigade dan Pedoman Pelaksanaan Pencegahan serta Pengendalian Kebakaran Lahan dan Kebun".</p> <p>Furthermore, the company also indentified local regulations, for example: "Keputusan Gubernur Sumatera Utara No. 188.44/10/KPTS/ 2018 tentang Penetapan Upah Minimum Sektoral Kabupaten Labuhan Batu Selatan tahun 2018".</p>	
<p>2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance –</p>	<p>Company has developed a mechanism for ensuring compliance to regulation as stated in document CA/SOP/1 issued date 1 November 2011 (Prosedur Informasi Perubahan Undang-Undang dan Peraturan Pemerintah).</p> <p>Procedure has regulated each of operation unit head shall be monitored and visited site location to check implementation of regulation. Company has developed a mechanism for ensuring compliance to regulation under document "Evaluasi Pemenuhan Peraturan Perundang-Undangan". In these documents, company has evaluated in detail for each clause dan the evidence for compliance is available.</p> <p>Verified activity to demonstrate compliance against new regulation, as in :Peraturan Menteri Pertanian No.5 tahun 2018 tentang Pembukaan dan/atau Pengolahan Lahan Perkebunan Tanpa Membakar sebagai Pengganti Peraturan Menteri Pertanian No. 47 tahun 2014 tentang Brigade dan Pedoman Pelaksanaan Pencegahan serta Pengendalian Kebakaran Lahan dan Kebun" – ministry of agriculture regulation related to zero burning. The implementation from company was to conduct replanting without using fire/zero burning.</p>	<p>Comply</p>
<p>2.1.4 A system for tracking any changes in the law shall be available and implemented. - Minor compliance –</p>	<p>Company has developed a mechanism for tracking any changes in the law as stated in document CA/SOP/1 issued date 1 November 2011 (Prosedur Informasi Perubahan Undang-Undang dan Peaturan Pemerintah).</p> <p>The company has evaluated and updated on compliance annually, as in document "Pemantauan Penambahan atau perubahan Undang-Undang/Peraturan".</p> <p>In 2018 there are 2 regulations were evaluated, e.g: - "Peraturan Menteri Pertanian No.5 tahun 2018 tentang Pembukaan dan/atau Pengolahan Lahan Perkebunan Tanpa Membakar sebagai Pengganti Peraturan Menteri Pertanian No. 47 tahun 2014 tentang Brigade dan Pedoman Pelaksanaan Pencegahan serta Pengendalian Kebakaran Lahan dan Kebun".</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - "Keputusan Gubernur Sumatera Utara No. 188.44/10/KPTS/ 2018 tentang Penetapan Upah Minimum Sektor Labuhan Batu Selatan tahun 2018".. <p>In these documents has evaluated in detail for each clause dan the evidence for compliance is available.</p>	
<p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>		
<p>2.2.1</p> <p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>PT. Tolan Tiga Indonesia has demonstrated the document relevants legal requirement, such as:</p> <p>1. Land Title Right documents:</p> <ul style="list-style-type: none"> - Hand over Agreement between Indonesian Government and Societe Internationale de Plantations Et de Finnance S.A-SIPEF (Belgium), dated 19 April 1968 for 3,000 Ha and 7,031.27 Ha - "Risalah Pemeriksaan Tanah dari Panitia "B" No. 40/PPT/B/69", dated 17 December 1968 and "Risalah Pemeriksaan Tanah dari Panitia "B" No.48/PPT/B/71", dated 7 December 1971. - "Fatwa Tata Guna Tanah berdasarkan Surat Kepala Inspeksi Badan Pertanahan Nasional Sumatera Utara", dated 18 April 1970. - The last renewal "Ijin Usaha Tetap-IUT No.394/T/Kehutanan-Perkebunan/1998", dated 21 Agustus 1998, for 8,479.06 Ha. - "Surat Pendaftaran Usaha Perkebunan (Operational Busines permit) No.213/Menhutbun-VII/2000", dated 10 March 2000 for 8,479.06 Ha with Mill capacity 75 tonnes FFB/hour and Mill capacity permit 60 tonnes FFB/hour. - Land Title rights (HGU) from Badan Pertanahan Nasional/BPN (National Land Authority) No.SK.80/HGU/DA/97, dated 16 July 1997 (6,042.44 Ha), this was divided into 4,807.02 Ha as Perlabian Estate and 1,235.42 Ha for Tolan Estate. - Land title rights (HGU) from BPN (National land Authority) No.86/HGU/BPN/97, dated 23rd July 1997 for 2,436.62 Ha in the entirety under Tolan Estate. <p>The total certified land; from the Hak Guna Usaha/HGU for Perlabian Estate was 4,807.02 Ha and for Tolan Estate was 3,672.04 Ha – as documented in Section 1.</p>	<p>Comply</p>
<p>2.2.2</p> <p>Legal boundaries are demonstrated clearly and maintained.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>All legal boundaries are clearly demarcated and maintained in the form of boundary stones, these boundary stones are photographed, mapped and GPS location is recorded.</p> <p>Tolan Estate demonstrated during field inspections in HGU No IX, 01, 02, 03, 04 and 05 Division V there are confirmed that boundaries are demarcated by trenches and boundary stones, the company also</p>	<p>Comply</p>

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	<p>conduct legal boundary stones monthly as recorded in "Blangko Cek Patok HGU".</p> <p>In Perlabian Estate, the boundary pole BPN RI PT TTI 5, at block 99B23 bordering with Dusun Menanti Desa Meranti, GPS: 1° 59' 56.46" N and 100° 1' 45.75" E.</p> <p>Boundary pole BPN RI PT TTI 5, at block 99B23 bordering with Dusun Menanti Desa Meranti, GPS: 1° 59' 53.61" N and 100° 1' 41.77" E.</p> <p>Boundary pole BPN RI PT TTI XII, at block 99B20A bordering with Dusun Menanti Desa Meranti, GPS: 2° 0' 13.64" N and 100° 1' 46.50" E.</p>	
<p>2.2.3</p> <p>In the event that there is a dispute or a dispute has occurred, adequate evidence of legitimate acquisition and compensation or compensation settlement process through conflict resolution which has been received through Free, Prior and Informed Consent by all related parties shall be provided.</p> <p>- Minor compliance -</p>	<p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.</p> <p>The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.</p> <p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village, Perlabian village, "Desa Persiapan Losari" and interview with NGO Tim 10, there are no report from local community on land conflict between company and community.</p> <p>Based on consultation with local governments Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.</p>	<p>Comply</p>
<p>2.2.4</p> <p>There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.</p> <p>- Major compliance -</p>	<p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.</p> <p>The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.</p> <p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village, Perlabian village, "Desa Persiapan Losari" and</p>	<p>Comply</p>

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	<p>interview with NGO Tim 10, there are no report from local community on land conflict between company and community.</p> <p>Based on consultation with local governments Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.</p>	
<p>2.2.5</p> <p>For any conflict or dispute over the land, the evidence of the extent of disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities and local government where applicable), shall be available.</p> <p>- Minor compliance –</p>	<p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.</p> <p>The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.</p> <p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village, Perlabian village, "Desa Persiapan Losari" and interview with NGO Tim 10, there are no report from local community on land conflict between company and community.</p> <p>Based on consultation with local governments Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.</p>	<p>Comply</p>
<p>2.2.6</p> <p>To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and/or planned operations.</p> <p>- Major compliance –</p>	<p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.</p> <p>The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.</p> <p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village and interview with NGO Tim 10, there are no report from local community on land conflict between company and community. Additional information gathered that company never instigate violence in</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	resolving issues. Based on consultation with local governments Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.	
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		
2.3.1	Maps with appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities). - Major compliance -	Comply
2.3.2	Copies of negotiated agreements including the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and these include: a) Evidence of consultation b) Statement of transfer of rights c) Evidence of compensation See specific guidance 2.3.2 - Minor compliance -	Comply

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	<p>- Land title rights (HGU) from BPN (National land Authority) No.86/HGU/BPN/97, dated 23 July 1997 (2,436.62 Ha) for Tolan Estate.</p> <p>The land compensation process have been completed since mid 1960s. There are no area under company concession was under dispute.</p> <p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.</p> <p>The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.</p> <p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village, Perlabian village, "Desa Persiapan Losari" and interview with NGO Tim 10, there are no report from local community on land conflict between company and community.</p> <p>Based on consultation with local goverments Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.</p>	
<p>2.3.3</p> <p>Relevant information shall be available in appropriate forms and languages, including analysis of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.</p> <p>The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter. All procedures/information available in Bahasa Indonesia.</p> <p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village, Perlabian village, "Desa Persiapan Losari" and interview with NGO Tim 10, there are no report from local community on land conflict between company</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance																																				
	<p>and community. Based on consultation with local governments Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.</p>																																					
<p>2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. - Major compliance -</p>	<p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party. The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.</p> <p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village, Perlabian village, "Desa Persiapan Losari" and interview with NGO Tim 10, there are no report from local community on land conflict between company and community.</p> <p>Based on consultation with local governments Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.</p>	<p>Comply</p>																																				
<p>Principle 3: Commitment to long-term economic and financial viability</p>																																						
<p>Criterion 3.1:</p>																																						
<p>There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>																																						
<p>3.1.1 A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders. - Major compliance-</p>	<p>PT. Tolan Tiga Indonesia have prepared a management plan. The plan have taken into consideration the cost versus income, exchange rate, depreciation, and inflation rate. Perlabian POM been able to demonstrate business plan for 2018 – 2027, indicating the FFB production/processed, palm oil production and palm kernel production, cost (for field work – estate) and processing cost, including overhead cost.</p> <table border="1" data-bbox="715 1733 1206 1899"> <thead> <tr> <th>Description</th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>192,591</td> <td>188,125</td> <td>185,628</td> </tr> <tr> <td>CPO</td> <td>44296</td> <td>43269</td> <td>42694</td> </tr> <tr> <td>PK</td> <td>10593</td> <td>10535</td> <td>10395</td> </tr> <tr> <td>OER</td> <td>23.0%</td> <td>23.0%</td> <td>23.0%</td> </tr> <tr> <td>KER</td> <td>5.5%</td> <td>5.5%</td> <td>5.5%</td> </tr> </tbody> </table> <table border="1" data-bbox="715 1928 1091 2031"> <thead> <tr> <th>Description</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>182,954</td> <td>180,941</td> </tr> <tr> <td>CPO</td> <td>42,079</td> <td>41,616</td> </tr> <tr> <td>PK</td> <td>10,245</td> <td>10,314</td> </tr> </tbody> </table>	Description	2018	2019	2020	FFB	192,591	188,125	185,628	CPO	44296	43269	42694	PK	10593	10535	10395	OER	23.0%	23.0%	23.0%	KER	5.5%	5.5%	5.5%	Description	2021	2022	FFB	182,954	180,941	CPO	42,079	41,616	PK	10,245	10,314	<p>Comply</p>
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<p>3.1.2</p>	<p data-bbox="237 1200 692 1420">An annual replanting program projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance-</p> <p data-bbox="716 1200 1299 1254">Replanting Plan for Perlabian Estate, explained as below:</p> <table border="1" data-bbox="716 1254 1227 1525"> <thead> <tr> <th>Replanting year</th> <th>Division/ Planting year</th> <th>Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1992, 1996</td> <td>202.75</td> </tr> <tr> <td>2019</td> <td>1992, 1993, 1996</td> <td>195.93</td> </tr> <tr> <td>2020</td> <td>1993, 1996</td> <td>165.77</td> </tr> <tr> <td>2021</td> <td>1992, 1994, 1996</td> <td>178.60</td> </tr> <tr> <td>2022</td> <td>1993, 1995</td> <td>220.71</td> </tr> <tr> <td>2023</td> <td>1995</td> <td>190.52</td> </tr> <tr> <td>2024-2027</td> <td>Planting holiday</td> <td>0</td> </tr> <tr> <td>2028</td> <td>2003</td> <td>168.39</td> </tr> </tbody> </table> <p data-bbox="716 1525 1299 1610">There was change in replanting plan Perlabian Estate. The adjustment was agreed upon during manager meeting dated 30 May 2017.</p> <p data-bbox="716 1610 1299 1843">Planting plan review for replanting plan year 2018 by ENC Department, dated 28 September 2017 for 203.15 Ha (planted area of 208.77 Ha and buffer zone of 2.11 Ha) in Perlabian Estate. The review taking into consideration all information regarding: palm yield, planting map, planting material (BLRS), soil map, topographic map, slope map, HCV map (2.11 Ha), risk assessment, replanting work schedule.</p> <p data-bbox="716 1872 1078 1928">Tolan Estate: The planting year in Tolan Estate:</p> <table border="1" data-bbox="716 1928 1024 2031"> <thead> <tr> <th>Planting year</th> <th>Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>OP 1996</td> <td>161.96</td> </tr> <tr> <td>OP 1997</td> <td>178.91</td> </tr> <tr> <td>OP 1998</td> <td>431.46</td> </tr> </tbody> </table>	Replanting year	Division/ Planting year	Hectarage (Ha)	2018	1992, 1996	202.75	2019	1992, 1993, 1996	195.93	2020	1993, 1996	165.77	2021	1992, 1994, 1996	178.60	2022	1993, 1995	220.71	2023	1995	190.52	2024-2027	Planting holiday	0	2028	2003	168.39	Planting year	Hectarage (Ha)	OP 1996	161.96	OP 1997	178.91	OP 1998	431.46	<p>Comply</p>
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Principle 4: Use of appropriate best practices by growers and millers

Criterion 4.1:

Operating procedures are appropriately documented, consistently implemented and monitored.

4.1.1	<p>Standard Operating Procedures (SOPs) for estates (land clearing to harvesting) and SOP for mills (reception of FFB to dispatch of CPO and PKO) shall be available.</p> <p>- Major compliance -</p>	<p>Estate:</p> <p>The procedures documented in "Agricultural Manual Oil Palm" (October 2009 and rev.on 2014) document #01-#18/SOP/Oil Palm/ESD, where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport. Interviews with the employees indicate satisfactory level of understanding and implementation in relation to their respective job function. Such as:</p> <ol style="list-style-type: none"> 1. Biological aspects of Practical Importance No.01/SOP/Oil Palm/ESD – Karakteristik Vegetatif Tanaman Kelapa Sawit 2. Pembibitan Kelapa Sawit: No.02/SOP/Oil Palm/ESD – nursery 3. Land Clearing: No.03/SOP/Oil Palm/ESD rev.2 4. Field Planting: No.04/SOP/Oil Palm/ESD rev.1 5. Palm Supplying: No.05/SOP/Oil Palm/ESD 6. Palm Thinning Out: No.06/SOP/Oil Palm/ESD 7. Ablasi: No.07/SOP/Oil Palm/ESD - Ablation 8. Frond Pruning: No.08/SOP/Oil Palm/ESD 9. Kumbang E. Camerunensis: No.09/SOP/Oil Palm/ESD – E. Camerunensis beetle 10. Sistem Pengelolaan Air: No.10/SOP/Oil Palm/ESD – water management 	Comply
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Criterion / Indicator	Assessment Findings	Compliance
	<p>11. Pemupukan: No.11/SOP/Oil Palm/ESD – fertilizer placement 12. Pest and Disease: No.12/SOP/Oil Palm/ESD 13. Harvesting Standard: No.13/SOP/Oil Palm/ESD 14. Sistem Pembuatan Jalan: No.12/SOP/Oil Palm/ESD – road construction 15. Pemakaian, Penyimpanan Pemusnahan Kemasan Bekas Pesticida: No.15/SOP/Oil Palm/ESD – pesticide handling 16. Pengelolaan Sempadan Sungai, Danau dan Waduk: No.16/SOP/Oil Palm/ESD – River, Lake and water dam management 17. Pengendalian Gulma Terpadu: No.17/SOP/Oil Palm/ESD – Integrated Weed Management</p> <p>Perlabian POM: Perlabian Mill has a set of procedure for processing of oil palm bunch into CPO and PK, under “Master List Working Instruction Perlabian POM”. The procedures explains all activity from receiving FFB into dispatch of products; Such as:</p> <ol style="list-style-type: none"> 1. Penimbangan truck dan brondolan, No.PLPOM-WI/PROD/001A, revision 01 dated 1 February 2011 2. Pengisian FFB ke dalam Lori, No.PLPOM-WI/PROD/004A, revision 01 dated 1 February 2011 3. Sortasi FFB, No.PLPOM-WI/PROD/007A, revision 00 dated 1st February 2014 4. Pengoperasian Screw Press No.PLPOM-WI/PROD/0013A, revision 01 dated 1 February 2011 5. Pengoperasian CST, No.PLPOM-WI/PROD/0016A, revision 01 dated 1st February 2011 6. Penimbangan Trucuk Tangki CPO, No.PLPOM-WI/PROD/0002A, revision 02 dated 14 January 2017 7. Dispatch Kernel PL-POM, No.PLPOM-WI/PROD/003A, revision 01 dated 1 February 2014 	
<p>4.1.2</p>	<p>Checking or monitoring of operations procedures is conducted at least once a year. - Minor compliance -</p>	<p>Comply</p>

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	There were 42 issues related to mill machinery condition and infrastructure - raised during the visit. Sampled findings: Some of the rail track at the sterilizer station are worn out or bent and need replacing; The chain of EFB elevator is stretched and needs replacing. This should be scheduled after new EFB elevator installed.		
4.1.3	Records of monitoring and any follow-up actions shall be available. - Minor compliance -	The Director of Engineering Visit dated 19 April 2017. There were 42 issues related to mill machinery condition and infrastructure - raised during the visit. Sampled findings: Some of the rail track at the sterilizer station are worn out or bent and need replacing; The chain of EFB elevator is stretched and needs replacing. 25 points have been followed up as per December 2017. The balance of 17 issues have been followed up by management unit. It will be closed, during subsequent visit by Director of Engineering. Only 7 issues, such as mill's cladding, walls, machineries - which required and related to capital expenditure awaiting Board of Director approval; Director of Engineering have made recommendation.	Comply
4.1.4	Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and outgrower) shall be available. - Major compliance -	Perlabian POM does not received and/or process FFB from third-party sources. Perlabian POM was receiving FFB only from certified source, Perlabian Estate and Tolan Estate.	Not Applicable N/A
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	A record of SOP implementation to maintain soil fertility that ensures optimal and sustained yield, shall be available. - Major compliance -	PT. Tolan Tiga Indonesia has established procedure to manage soil fertility such as: 1.General Information: Fertiliser (OPM-06-00/02-10-2017/Rev.2) dated 20 November 2017. 2.Inorganic Fertiliser (OPM-06-01/02-10-2017/Rev.2) dated 20 November 2017. 3.Organic Fertilisers (OPM-06-02/02-10-2017/Rev.2) dated 20 November 2017. The procedures consist of manual fertilizer application and fertilizer application with spreader. The objective of the activity to provide nutrients which are soluble and immediately available to the plants. Fertilizers are applied according to the "4-Right principle" (Right time, right dosage, right target and right type. Type of inorganic fertilizer consist of N (Urea); P (CIRP, RP, TSP, SP36); K (KCl, MOP, Bunch Ash); Mg (Dolomite, Kieserite); B (Borate); other nutrients (CuSO4 and ZnSO4). Organic fertilizer application consist of EFB application and POME application. Based on field visit in estates and document review, fertilizer application for year 2017 has completed as well as January-February 2018. Inorganic fertilizer applied based on fertilizer recommendation.	Comply
4.2.2	Records of fertilizer inputs shall be	Each estate maintains a complete record of fertilizer	Comply

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<p>available. - Minor compliance -</p>	<p>inputs – both organic and in-organic as documented in “Monthly Manuring Program”. Fertilizer input applied based on recommendation. Fertilizer recommendation documented in “Oil Palm Fertilizer Recommendation for PT. Tolan Tiga Indonesia – Perlabian Estate (2nd Semester 2017, 1st and 2nd Semester 2018)” and “Oil Palm Fertilizer Recommendation for PT Tolan Tiga Indonesia – Tolan Estate (2nd Semester 2017, 1st and 2nd Semester 2018)” by Verdant Bioscience.</p> <p>Perlabian Estate: Oil Palm Fertilizer recommendation for 1st half 2018 – Mature for Block 06H05A (26.42 Ha, total stand 3,279 palms, SPH 124 palm/Ha) is to have 1.5 kg/palm Urea; 1 kg/palm RP; 1 kg/palm MOP; 0.5 kg/palm Dolomite. For Block 93D08A (34.13 Ha, total stand 4,401 palms, SPH 129 palm/Ha) is to have 1.5 kg/palm Urea; 1 kg/palm RockPhospate; 1 kg/palm MOP and 0.5 kg/palm Dolomite.</p> <p>Application: Total application in Block 06H05A: 3,279 kg MOP on 18 January 2018; 4,919 kg Urea on 13 January 2018. In Block 93D08A: 4,401 kg of MOP on 14 February 2018; 4,401 kg of CIRP on 26 February 2018; 6,602 kg of Urea on 12 February 2018.</p> <p>Tolan Estate: Fertilizer recommendation 1st half 2018 for Division III Block 99B19A (25.12 Ha, 3,172 palms) is to have 1.50 kg/palm Urea; 1.00 kg/palm Rock Phospate; 1.00 kg/palm MOP; and 0.50 kg/palm Dolomite. Actual application: 4,758 kg of Urea (applied on 6 February 2018); 3,172 kg of RP (applied on 23 March 2018); and 3,172 kg MOP (applied on 2 March 2018).</p> <p>Fertilizer recommendation 1st half 2018 for Division V Block 03D34 (21.79 Ha, 2,758 palms) is to have 1.50 kg/palm Urea; 1.00 kg/palm Rock Phosphate; 1.00 kg/palm MOP; 0.50 kg/palm Dolomite; and 0.10 kg/palm HGFB. Actual application: 4,137 kg of Urea (applied on 18 January 2018); 2,758 kg of RP (applied on 20 March 2018); and 2,758 kg of MOP (applied on 24 February 2018).</p>		
<p>4.2.3</p>	<p>Records of periodical leaf, soil and visual analysis shall be available. - Minor compliance -</p>	<p>PT. Tolan Tiga Indonesia has conducted Semi-Detailed Soil Survey as documented in Semi Detailed Soil Survey Report of PT. Tolan Tiga Indonesia – Perlabian Estate and Tolan Estate in Kecamatan Kampong Rakyat, Kabupaten Labuhan Batu Selatan, Province of Sumatera, Indonesia by JH Agriculture Service, October 2009. Within the semi-detailed soil survey report, topographic condition, soil fertility status and other information has been accounted into.</p> <p>The company conducted leaf sampling analysis</p>	<p>Comply</p>

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	<p>annually for fertilizer recommendation. The company also conducted soil sampling analysis in 6 years interval for each block.</p> <p>Perlabian Estate: Leaf sampling analysis available under "Sertifikat Hasil Pengujian Jaringan Tanaman" by Laboratorium Central Plantation Services, PT Central Alam Resources Letari, No. 1319/CPS/I/2018 dated 17/01/2018, sample received on 13/12/2017, analysis done on 16/01/2018. Taken from 10 oil palm leaf and rachis samples. E.g. laboratory code TP1712319L13312, Block D18-19, Divisi PLE/IV/2003, results: 2.37% N, 0.155% P, 0.94% K, 0.19% Mg, 0.43% Ca, 17.1 ppm B.</p> <p>Soil sampling analysis available under Soil Analysis Report by Bangun Bandar Analytical Laboratory, PT Socfin Indonesia, Ref Order: 01/STC-soil/III/2016, Ref Number: S16-021/LAB-SSPL/III/2016, taken from 42 sample. Sample received on 19/03/2016, sample analysed on 23/04/2016. E.g. Laboratory code S1600162; user code: PLE M21 MIX; Depth 0-20 cm; pH H₂O 5.2; Sand 63.6%; Silt 14.5%; Clay 21.8%; N 0.44%; C 3.01%; P 61.3%; CEC 38.77%; K 0.14%; Ca 0.19%; Mg 0.42%; Na 7.53%.</p> <p>Tolan Estate: Leaf sampling analysis is available under "Sertifikat Hasil Pengujian" by Laboratorium Central Plantation Services, PT. Central Alam Resources Letari, No. CPS/252/III/2017 dated 30/03/2017, sample received on 18/03/2017, analysis done on 30/03/2018. Taken from 6 oil palm leaf and rachis samples. E.g. laboratory code TP1703252L01495, Block D5, D6, Divisi Tolan Estate/I/ BIMONTHLY/FEBRUARY 2016/2005, results: 2.54% N, 0.162% P, 0.90% K, 0.24% Mg, 0.65% Ca, 13.8 ppm B.</p> <p>Soil sampling analysis available under Soil Analysis Report by Bangun Bandar Analytical Laboratory, PT Socfin Indonesia, Ref Order: 01/STC-soil/III/2016, Ref Number: S16-020/LAB-SSPL/III/2016, taken from 27 sampleS. Sample received on 19/03/2016, sample analysed on 23/04/2016. E.g. Laboratory code S1600135; user code: TLE D34 MIX; Depth 0-20 cm; pH H₂O 4.8; Sand 54.6%; Silt 10.5%; Clay 34.9%; N 0.33%; C 0.88%; P 33.92%; CEC 29.70%; K 0.10%; Ca 0.64%; Mg 0.25%; Na 0.00%.</p>	
<p>4.2.4</p>	<p>A nutrient recycling strategy is recorded, including use of Empty Fruit Bunches (EFB), land application, and palm residues after replanting. - Minor compliance -</p>	<p>Comply</p>

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	<p>tonnage 18,184.155 tons; Division IV: area of application 252.98 Ha, EFB tonnage 9,732.715 tons; Division VI: area of application 138.04 Ha, EFB tonnage 8,307.640 tons. In 2018 applied EFB in Division III: area of application 22.30 Ha (Block 06I07A, 06H07A, 06H08A), EFB tonnage 1,115 tons; Division IV: area of application 79.61 Ha (Block 17E08 - 17E11, 17F10 – 17F13), EFB tonnage 2,786.5 tons; Division V: area of application 69.68 Ha (Block 95E03 – 95E06A, 95E03), EFB tonnage 3,484.53 tons.</p> <p>Data volume land application 2017, in block 05C12A (21.06 Ha), 05C11A (27.67 Ha), 05C10A (29.39 Ha) and 05C09A (17.49 Ha), total application are: January : 10,519.30 m³ February : 7,905.15 m³ March : 9,825 m³ April : 10,565 m³ May: 11,580 m³ June: 7,913 m³ July: 11,245 m³ August: 10,297 m³ September: 10,452 m³ October: 12,345 m³ November: 10,019 m³ December: 10,579 m³ Average application per day in 2017 was 421.443 m³.</p> <p>Land application volume in 2018 are: January: 10,101 m³ February: 9,447 m³ Average application per day in 2018 was 421.076 m³.</p> <p>Tolan Estate: Due to distance from mill, no EFB application in Tolan Estate for year 2017 and 2018. Frond stacking is evident on estate.</p>		
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>			
<p>4.3.1</p>	<p>Maps of any fragile soils shall be available. - Major compliance -</p>	<p>Soil map is available in document Semi Detailed Soil Survey Report of PT. Tolan Tiga Indonesia – Perlajian Estate and Tolan Estate in Kecamatan Kampong Rakyat, Kabupaten Labuhan Batu Selatan, Province of Sumatera, Indonesia by JH Agriculture Service, October 2009. There is no fragile soil reported in the soil survey carried out 2009 by JH Agriculture Services. Recent maps are available of all soils in all estates. Limitation in form of sandy soil and surface run-off of top soil, as well as steeper terrain on Tolan Estate.</p>	<p>Comply</p>
<p>4.3.2</p>	<p>A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -</p>	<p>Based on result of semi detail soil survey by JH Agriculture Services, topography of PT. Tolan Tiga Indonesia is mainly raised flat to gently undulating. Southern part of Tolan Estate is rolling to hilly with slope between 6 to 20°. The area are 628 Ha (7 %) are low lying flat; 1,876 Ha (23 %) are raised flat;</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>4,623 Ha (56 %) are raised flat to gently undulating; 326 Ha (4 %) are gently undulating to rolling and 797 Ha (10 %) are rolling to hilly.</p> <p>No planting since 2007 on slopes in excess of 25°. There is in fact very little planting on sloped land throughout PT. Tolan Tiga Indonesia. Planting on steeper terrain prepared with infrastructure such as terrace or individual terrace.</p> <p>Tolan Estate: Terracing are sight based on field observation. Terrace contour is implemented and maintained in Block 03D34 (21.79 Ha) and 03D35 (19.86 Ha) Division V.</p>	
<p>4.3.3 A road maintenance program shall be in place. - Minor compliance –</p>	<p>Road maintenance program prepared by estate each year; evidence of maintenance was recorded in the "Road Miantenance Program", available for 2017 and 2018. Realization of road maintenance program has been periodically monitored in montly basis and also the company provides road map realization to monitor road maintenance program is properly implemented.</p> <p>Based on field verification to Perlabian and Tolan Estate, demonstrates all road are in good condition and can be passed by vehicle.</p> <p>Road maintenance program Perlabian Estate (Grading and Compacting) 2018 is available, for Division I (665.85 Ha) planned 62,820 meters, Division II (769.47 Ha) planned 72,596 meters, in Division III (728.42 Ha) planned 68,723 meters, in Division IV (797.60 Ha) planned 75,250 meters, in Division V (841.29 Ha) planned 79,372 meters and in Division VI (754.36 Ha) planned 71,170 meters. Total realization in 2018, e.g: Division I: 12,600 meters, Division II: 16,100 meters, Division III: 17,000 meters, Division IV: 25,200 meters, Division V: 9,400 meters, Division VI: 6,500 meters.</p> <p>Road maintenance program of Tolan Estate for 2017 and 2018 are available. Mechanical road maintenance are performed using grading compact. Road maintenance for 2017 has been completed for 355,460 meters. Road maintenance program for 2018 has been prepared for 201,404 meters, until now the realization progress is 29,200 meters.</p>	<p>Comply</p>
<p>4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Major compliance –</p>	<p>Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate. Subsidence monitoring is not applicable.</p>	<p>Comply</p>
<p>4.3.5 Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil</p>	<p>Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate. Drainability Assessment is not applicable.</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>palm growing. - Minor compliance –</p>		
<p>4.3.6 A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance –</p>	<p>Based on JH Agriculture Semi Detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan Estate. Limitation to oil palm growth and performance are sandy soil of Tungkal and Kesuma series with palms prone to moisture stress during drier months; surface run-off of top soil and applied fertilizer especially on sandy soil and steeper terrain in Tolan Estate during rainy months. The recommendation is to establish <i>Mucuna bracteata</i> leguminous ground cover for future replant, particularly on sandy soil and on steeper terrain.</p> <p>Based on field observation to Perlabian Estate's replanting preparation area year 2018 in Division I Block 18L12 (9.53 Ha) <i>Mucuna bracteata</i> are planted in all area, as well as replanting area year 2017 at Division IV Block 17E09 (26.31 Ha) and Block 17E10 (22.83 Ha). Based on document "Nursery Transfer to Block Summary for January to December 2017", <i>Mucuna</i> has been transfer and planted to Block 18L12 as much as 10,203 polybags, to Block 17E09 as much as 24,880 polybags and Block 17E10 as much as 28,600 polybags.</p> <p>Terracing in Tolan Estate are sighted based on field observation. Terrace contour is implemented and maintained in Block 03D34 (21.79 Ha) and 03D35 (19.86 Ha) Division V.</p>	<p>Comply</p>
<p>Criterion 4.4: Practices maintain the quality and availability of surface and ground water.</p>		
<p>4.4.1 An implemented water management plan shall be in place. - Minor compliance -</p>	<p>PT. Tolan Tiga Indonesia has in place a policy with regards to the protection of watercourses and wetlands which includes dedicated buffer zones and riparian areas – including establishing buffers along rivers in accordance with Indonesian laws - 50 meters buffer on each side for small rivers. The last updated is on 20 September 2016.</p> <p>It is the policy of PT. Tolan Tiga Indonesia that all buffer zones as stipulated by Indonesian law are re-established at replanting. PT. Tolan Tiga Indonesia has also Water Management Plan and implemented. This was in evidence during replanting, presently in Perlabian and Tolan estates. The required buffer zones were seen to have been established during this process. The buffer zones are in places, to prevent run off, coming from nutrients and chemicals through the planting upkeep.</p> <p>Chemical handlers are trained in the disposal of chemicals - waste chemicals containers are disposed of or are re-used for sprayers in field.</p> <p>PT. Tolan Tiga Indonesia has a permit for use of</p>	<p>Comply</p>

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	<p>ground water covering Perlabian POM, Perlabian Estate and Tolan Estate based on "Keputusan Kepala Badan Pelayanan Perijinan Terpadu Provinsi Sumatera Utara No. 546.2/408/BPPTSU/ 2/XI/XI.3b/IX/2016 until 546.2/415/BPPTSU/2/XI/XI.3b/ IX/2016, regarding permit of ground water intake, dated 19 September 2016, valid until 3 years.</p> <p>Perlabian POM has shown the document of Water Management Plan, dated 25 August 2016, describing the water for mill process and domestic use are from Sripinang river, and then processed into water intake 72 m³/hour, water need for water treatment plant is 5,941 m³/month; water dilution for screw press is 4,200 m³/hour; water deashing at boiler's dust collector is 2,350 m³/month; water clarification is 1,864 m³/month; water toilet need is 40.12 m³/month.</p> <p>Perlabian POM has shown permit of surface water intake based on Decree of North Sumatera Governor No. 610/38/DIS PM PPTSP/6/XI.1/I/2018 dated 9 January 2018 regarding "Izin Penggunaan Sumber Daya Air", allowed debit is 30 L/second, valid for 3 years.</p> <p>In Tolan Estate, the eater permit noted, as per:</p> <ul style="list-style-type: none"> • "Keputusan Gubernur Sumatera Utara" No.546.2/421/BPPTSU/2/XI.3b/IX/2016 regarding "Izin Pengambilan Air Tanah Kepada PT Tolan Tiga Indonesia" dated 19 September 2016, located at TTS Sripinang Desa Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan, valid until 3 years. • "Keputusan Gubernur Sumatera Utara" No.546.2/418/BPPTSU/2/XI.3b/IX/2016 regarding "Izin Pengambilan Air Tanah Kepada PT Tolan Tiga Indonesia" dated 19 September 2016, located at Perum TTS Ujung Desa Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan, valid until 3 years. • "Keputusan Gubernur Sumatera Utara" No.546.2/419/BPPTSU/2/XI.3b/IX/2016 regarding "Izin Pengambilan Air Tanah Kepada PT Tolan Tiga Indonesia" dated 19 September 2016, located at Perum TTS Plank Desa Perkebunan Selapian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan, valid until 3 years. <p>"Keputusan Gubernur Sumatera Utara" No.546.2/420/BPPTSU/2/XI.3b/IX/2016 regarding "Izin Pengambilan Air Tanah Kepada PT. Tolan Tiga Indonesia" dated 19 September 2016, located at TTS Plank Nursery Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan, valid until 3 years.</p>		
4.4.2	Protection of water courses and	Water Management Plan, indicating the water need,	Comply

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Criterion / Indicator	Assessment Findings	Compliance																																																																																																																																		
	<p>wetlands, including securing and maintaining appropriate riparian and other buffer zones, at the time of or prior to replanting shall be demonstrated.</p> <p>- Major compliance -</p>																																																																																																																																			
<p>4.4.3</p> <p>Records for monitoring of effluent especially BOD (Biochemical Oxygen Demand) and efforts to comply with legal requirements, shall be available (see criteria 2.1 and 5.6).</p> <p>- Minor compliance -</p>	<p>In Perlabian POM, the result of BOD sampling analysis shown that no more than 5,000 mg/Liter as lined out by Indonesian regulation. As in September 2015, company has introduced a new method by using sludge decanter – collecting the solid and put into sludge bunker, therefore the solid can be separated from the palm oil mill effluent, affecting the pH and BOD level. Document seen: “Pengoperasian Sludge Decanter” No.PLPOM-WI/PROD/022A rev.1 dated 1 October 2015.</p> <p>The result of monitoring year 2017, location in outlet:</p> <table border="1" data-bbox="715 1227 1289 1608"> <thead> <tr> <th>Month /Year</th> <th>BOD (mg/L)</th> <th>COD (mg/L)</th> <th>Oil& Grease (mg/L)</th> <th>Pb (mg/L)</th> </tr> </thead> <tbody> <tr><td>Jan 2017</td><td>358.30</td><td>1932</td><td>9.55</td><td>0.02</td></tr> <tr><td>Feb 2017</td><td>540.6</td><td>1386</td><td>13.88</td><td>0.01</td></tr> <tr><td>Mar 2017</td><td>63.10</td><td>290.62</td><td>2.05</td><td>0.11</td></tr> <tr><td>Apr 2017</td><td>85.31</td><td>507.81</td><td>2.40</td><td>0.02</td></tr> <tr><td>May 2017</td><td>52.11</td><td>314.81</td><td>2.40</td><td>0.04</td></tr> <tr><td>Jun 2017</td><td>55.81</td><td>285.71</td><td>4.80</td><td>0.03</td></tr> <tr><td>Jul 2017</td><td>56.25</td><td>448.28</td><td>32.00</td><td>0.03</td></tr> <tr><td>Aug 2017</td><td>106.57</td><td>666.67</td><td>31.60</td><td>0.02</td></tr> <tr><td>Sep 2017</td><td>766</td><td>3709</td><td>0.2</td><td><0.0016</td></tr> <tr><td>Oct 2017</td><td>2304</td><td>4054</td><td>1.3</td><td><0.0017</td></tr> <tr><td>Nov 2017</td><td>81.3</td><td>106</td><td>1.2</td><td><0.0017</td></tr> <tr><td>Dec 2017</td><td>1836</td><td>3665</td><td>1.9</td><td><0.0017</td></tr> </tbody> </table> <table border="1" data-bbox="715 1637 1289 2020"> <thead> <tr> <th>Month /Year</th> <th>Cu (mg/L)</th> <th>Cd (mg/L)</th> <th>Zn (mg/L)</th> <th>pH</th> </tr> </thead> <tbody> <tr><td>Jan 2017</td><td>0.02</td><td><0.001</td><td>0.01</td><td>8.1</td></tr> <tr><td>Feb 2017</td><td>0.03</td><td><0.001</td><td>0.12</td><td>7.9</td></tr> <tr><td>Mar 2017</td><td>0.02</td><td><0.001</td><td>0.01</td><td>7.4</td></tr> <tr><td>Apr 2017</td><td>0.07</td><td><0.001</td><td><0.003</td><td>8.0</td></tr> <tr><td>May 2017</td><td>0.01</td><td><0.001</td><td>0.07</td><td>7.6</td></tr> <tr><td>Jun 2017</td><td>0.02</td><td><0.001</td><td><0.003</td><td>6.9</td></tr> <tr><td>Jul 2017</td><td>0.003</td><td><0.001</td><td>0.02</td><td>6.5</td></tr> <tr><td>Aug 2017</td><td>0.01</td><td><0.003</td><td>1.68</td><td>6.9</td></tr> <tr><td>Sep 2017</td><td>0.76</td><td><0.002</td><td>1.3</td><td>6.83</td></tr> <tr><td>Oct 2017</td><td><0.015</td><td><0.0022</td><td>0.13</td><td>6.8</td></tr> <tr><td>Nov 2017</td><td><0.015</td><td><0.0022</td><td>0.53</td><td>6.94</td></tr> <tr><td>Dec 2017</td><td><0.015</td><td><0.0022</td><td>0.0080</td><td>6.95</td></tr> </tbody> </table>	Month /Year	BOD (mg/L)	COD (mg/L)	Oil& Grease (mg/L)	Pb (mg/L)	Jan 2017	358.30	1932	9.55	0.02	Feb 2017	540.6	1386	13.88	0.01	Mar 2017	63.10	290.62	2.05	0.11	Apr 2017	85.31	507.81	2.40	0.02	May 2017	52.11	314.81	2.40	0.04	Jun 2017	55.81	285.71	4.80	0.03	Jul 2017	56.25	448.28	32.00	0.03	Aug 2017	106.57	666.67	31.60	0.02	Sep 2017	766	3709	0.2	<0.0016	Oct 2017	2304	4054	1.3	<0.0017	Nov 2017	81.3	106	1.2	<0.0017	Dec 2017	1836	3665	1.9	<0.0017	Month /Year	Cu (mg/L)	Cd (mg/L)	Zn (mg/L)	pH	Jan 2017	0.02	<0.001	0.01	8.1	Feb 2017	0.03	<0.001	0.12	7.9	Mar 2017	0.02	<0.001	0.01	7.4	Apr 2017	0.07	<0.001	<0.003	8.0	May 2017	0.01	<0.001	0.07	7.6	Jun 2017	0.02	<0.001	<0.003	6.9	Jul 2017	0.003	<0.001	0.02	6.5	Aug 2017	0.01	<0.003	1.68	6.9	Sep 2017	0.76	<0.002	1.3	6.83	Oct 2017	<0.015	<0.0022	0.13	6.8	Nov 2017	<0.015	<0.0022	0.53	6.94	Dec 2017	<0.015	<0.0022	0.0080	6.95	<p>Comply</p>
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<p>4.4.4 Monitoring of mill water use per ton of FFB shall be recorded. - Minor compliance –</p>	<p>Perlabian POM recording the mill water use per tonne FFB. The record of water use available in “Pemakaian air dan HSD Oil per metrik FFB”. The budget of water use for FFB process sets at 1 m³/ton FFB processed. Record for year 2017 seen:</p> <table border="1" data-bbox="715 535 1230 1037"> <thead> <tr> <th>Month</th> <th>FFB Processed (tons)</th> <th>Water usage (m³)</th> <th>Water usage (m³/ton FFB)</th> </tr> </thead> <tbody> <tr><td>Jan 17</td><td>18,835</td><td>24,107</td><td>1.28</td></tr> <tr><td>Feb</td><td>13,302</td><td>18,182</td><td>1.37</td></tr> <tr><td>Mar</td><td>16,139</td><td>20,145</td><td>1.25</td></tr> <tr><td>Apr</td><td>14,244</td><td>18,114</td><td>1.27</td></tr> <tr><td>May</td><td>15,621</td><td>16,126</td><td>1.03</td></tr> <tr><td>Jun</td><td>12,940</td><td>11,542</td><td>0.89</td></tr> <tr><td>Jul</td><td>18,788</td><td>24,936</td><td>1.33</td></tr> <tr><td>Aug</td><td>18,940</td><td>24,946</td><td>1.32</td></tr> <tr><td>Sep</td><td>18,867</td><td>27,723</td><td>1.47</td></tr> <tr><td>Oct</td><td>18,786</td><td>25,656</td><td>1.37</td></tr> <tr><td>Nov</td><td>19,686</td><td>25,303</td><td>1.29</td></tr> <tr><td>Dec</td><td>16,759</td><td>20,313</td><td>1.23</td></tr> <tr><td colspan="3">Total Average</td><td>1.27</td></tr> <tr><td>Jan 18</td><td>19,141</td><td>18,184</td><td>0.95</td></tr> <tr><td>Feb</td><td>15,130</td><td>13,617</td><td>0.90</td></tr> <tr><td colspan="3">Total Average</td><td>0.93</td></tr> </tbody> </table> <p>Higher water consumption in year 2017 due to higher water required to operate boiler 26 tonnes – water discharge cooling system/flushing. Deviation in Januari 2017 due to higher water consumption for cleaning boiler ash in boiler 26 tonnes. Mill has reinstate the 30 tonnes boiler, to replace inefficient 26 tonnes boiler. The shifting from boiler 26 tonnes, into boiler 30 tonnes completed in January 2018.</p>	Month	FFB Processed (tons)	Water usage (m ³)	Water usage (m ³ /ton FFB)	Jan 17	18,835	24,107	1.28	Feb	13,302	18,182	1.37	Mar	16,139	20,145	1.25	Apr	14,244	18,114	1.27	May	15,621	16,126	1.03	Jun	12,940	11,542	0.89	Jul	18,788	24,936	1.33	Aug	18,940	24,946	1.32	Sep	18,867	27,723	1.47	Oct	18,786	25,656	1.37	Nov	19,686	25,303	1.29	Dec	16,759	20,313	1.23	Total Average			1.27	Jan 18	19,141	18,184	0.95	Feb	15,130	13,617	0.90	Total Average			0.93	<p>Comply</p>
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<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>																																																																						
<p>4.5.1 Monitoring of Integrated Pest Management (IPM) plan implementation shall be available. - Major compliance -</p>	<p>PT. Tolan Tiga Indonesia is able to demonstrate Integrated Pest Management under “Program Pengendalian Hama Terpadu 2018”, updated on 25 January 2018. These plans comprise of biological, physical and chemical treatment to control pest attack.</p> <p>Integrated Pest Management was documented and retrievable including building and maintenance of barn owl boxes, planting and maintenance of beneficial plants, pest and diseases census such as for ganoderma census. PT. Tolan Tiga Indonesia was implementing early warning system through regular pest monitoring (census) for rat and boar attack, leaf eating caterpillar as well. Reports are produced and maintained, chemical pesticide will only used if the pests attack above the economic threshold. Once implemented, management performs monitoring to recheck the program effectiveness.</p> <p>In Perlabian Estate, Recapitulation of Pest and</p>	<p>Comply</p>																																																																				

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	<p>Diseases Cencus, period February 2018 in division F.4 /replanting 2016, in block E15 (21.98 Ha), percentage of <i>Setora nitens</i> is 1.04%, <i>Dassychira inclusa</i> is 1.40% and <i>Apogonia</i> is 0.94% (treatment with collecting by census tim), <i>Orycthes rhinoceros</i> 0.10% (treatment by marshal 5 mg/palm).</p> <p>Barn owl monitoring per February 2018 in Division I there are 5 barn owl boxes at Block 93N16A, 93N18A, 94L16A, 96M16A and 96L19A; in Division III there are 15 barn owl boxes consist 2 in Block 06H07A, 2 in Block 06H09A, 06H10A, 06H11A, 06I08A, 2 in Block 17E09A, 3 in Block 17E10A, 92F06A, 17E11A and 17F12A.</p> <p>The Ganoderma census in Tolan Estate, period December 2017 shows in example in Division II Block 94D11 (27.39 Ha) total 358 palm infected (9.59%), consist of 240 palms stadium 1, 22 palms stadium 2, 79 palm stadium 3 and 17 palms stadium 4; in Division V Block 00A28A (34.39 Ha) total 73 palms infected (1.61%), consist of 24 palms stadium 1, 22 palms stadium 2, 23 palms stadium 3 and 4 palms stadium 4. Treatment with de-bolling and sanitation immediately.</p> <p>Barn owl monitoring done on monthly basis. Barn owl monitoring per February 2018 in Division I there are 5 barn owl boxes with 5 adult barn owl at Block 06C04, 06C07, 08C09, 05D05 and 05D03; in Division II there are 5 barn owl boxes with 2 adult barn owl 2 in Block 98D14, 98D16, 98D18, 98D20 and 98D20A; in Division III there are 7 barn owl boxes with 5 adult barn owl in Block 99C25A, 99C23A, 99C21A, 99C19A, 98C17A, 98C15 and 94C11; in Division IV there are 6 barn owl boxes with 5 adult barn owl at Block 97D23, 97D25, 97D27, 01D28, 01D31 and 97E24A; in Division V there are 5 barn owl boxes with 4 adult barn owl in Block 03F37A, 03F34A, 03E38, 03E36 and 03E34.</p> <p>Barn owl boxes re-installed near worker and staff housing, in order to minimize disturbance from monkey (<i>Maccaca fascicularis</i>). Latest barn owl release dated 23 March 2018.</p>	
<p>4.5.2</p>	<p>Training records of Integrated Pest Management (IPM) shall be available. - Minor compliance –</p> <p>There are training records for training of staff in regards to IPM and these are now formally recorded on all occasions. IPM training provided for field operators in all estates. The training was conducted by “Verdant Bioscience Indonesia”.</p> <p>In Perlabian Estate, the Integrated Pest Management training – Ganoderma census and treatment, dated 11 April 2017 and attended by 19 workers. Another dissemination of rat census – rat baiting, on 28 August 2017, attended by 15 participants.</p> <p>Record of Integrated Pest Management training in Tolan Estate are available. For example: on 11 April</p>	<p>Comply</p>

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	2017, on "Review Sensus Ganoderma" training, attended by 13 workers. Training of spraying and knapsack calibration conducted on 20 February 2018, attended by 13 personnel.																																			
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment																																				
4.6.1	Documented evidence shall be available to show that pesticide used based on regulations and the use of pesticide is specific to target species with appropriate dosage which have minimal impact on non-target species. - Major compliance -	The use of pesticide is under strict requirement, only in the case of pest attack past the economic threshold. The justification of pesticide used is explained under Procedure of Pest Control (no OPM-07-02/02-10-2017/Rev02, dated 18 November 2017), Procedure on Diseases Control (no OPM-07-03/02-10-2017/Rev02, dated 18 November 2017), Weed Control (no OPM-08-01/02-10-2017/Rev02, dated 18 November 2017). The procedures explain the identification of target species, agrochemical to be used, and dosage and area per application in general. A further dosage reduction controlled through budget. Visit to chemical store and record review shows company chemical product for specific target species (weed). PT. Tolan Tiga Indonesia has listed all pesticide and herbicide used on the field as per "Daftar Pestisida Yang Dipakai di Perlabian Estate ditahun 2018". All the pesticide and herbicide have valid license from government, such as: <table border="1" data-bbox="715 1211 1294 2042"> <thead> <tr> <th>Trademark</th> <th>Active Ingredients</th> <th>Register number</th> </tr> </thead> <tbody> <tr> <td>Smart 486 AS</td> <td>Isopropil amina glifosat 486 gr/ltr</td> <td>RI 01030119971313 – valid until September 2018</td> </tr> <tr> <td>Basta 150 SL</td> <td>Ammonium Glufosinat</td> <td>RI 01030119921113 – valid until December 2018</td> </tr> <tr> <td>Garlon 670 EC</td> <td>Trilokpir butoksi etil ester 670 gr/ltr</td> <td>RI 0103011984695– valid until September 2018</td> </tr> <tr> <td>Starane 290 EC</td> <td>Fluoksipir 290 gr/ltr</td> <td>RI 0103011988854– valid until April 2019</td> </tr> <tr> <td>Inteam 150 SL</td> <td>Ammonium glifosinat 150 gr/ltr</td> <td>RI01030120072763 – valid until December 2020</td> </tr> <tr> <td>Logran 75 wG</td> <td>Triafulsuron 75%</td> <td>RI 01030120062440– valid until December 2020</td> </tr> <tr> <td>Metsulindo 20 WP</td> <td>Metil Metsulfuron 20%</td> <td>RI 01030119991484– valid until May 2021</td> </tr> <tr> <td>Marshal 5 gr</td> <td>Karbosulfan 5%</td> <td>RI 01010119771279 – valid until October 2022</td> </tr> <tr> <td>Starthene 75 WG</td> <td>Acephate 75%</td> <td>RI0010120072983 – valid until August 2022</td> </tr> <tr> <td>Agristik 400 L</td> <td>Alkylaril Poliglikol Eter 400 gr/ltr</td> <td></td> </tr> </tbody> </table>	Trademark	Active Ingredients	Register number	Smart 486 AS	Isopropil amina glifosat 486 gr/ltr	RI 01030119971313 – valid until September 2018	Basta 150 SL	Ammonium Glufosinat	RI 01030119921113 – valid until December 2018	Garlon 670 EC	Trilokpir butoksi etil ester 670 gr/ltr	RI 0103011984695– valid until September 2018	Starane 290 EC	Fluoksipir 290 gr/ltr	RI 0103011988854– valid until April 2019	Inteam 150 SL	Ammonium glifosinat 150 gr/ltr	RI01030120072763 – valid until December 2020	Logran 75 wG	Triafulsuron 75%	RI 01030120062440– valid until December 2020	Metsulindo 20 WP	Metil Metsulfuron 20%	RI 01030119991484– valid until May 2021	Marshal 5 gr	Karbosulfan 5%	RI 01010119771279 – valid until October 2022	Starthene 75 WG	Acephate 75%	RI0010120072983 – valid until August 2022	Agristik 400 L	Alkylaril Poliglikol Eter 400 gr/ltr		Comply
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<p>4.6.2 Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications shall be available. - Major compliance -</p>	<p>PT. Tolan Tiga Indonesia has records of herbicide use, available and maintained at each Estate. The records shows the total chemical used (in kg and/or liters), the active ingredients used, total area treated (in Ha), and active ingredients used per area treated and per ton FFB produced. PT Tolan Tiga Indonesia is calculating the active ingredients per block on monthly basis.</p> <p>In Perlabian Estate, monitoring of pesticides use year 2017, reported on 24 March 2018, such as:</p> <table border="1"> <thead> <tr> <th data-bbox="715 869 970 920">Description</th> <th data-bbox="970 869 1121 920">Total Application</th> <th data-bbox="1121 869 1289 920">a.i (kg or liter/Ha)</th> </tr> </thead> <tbody> <tr> <td data-bbox="715 920 970 972">SMART (Isopropil amina glyphosate)</td> <td data-bbox="970 920 1121 972">8,651.17 liter</td> <td data-bbox="1121 920 1289 972">0.922641617</td> </tr> <tr> <td data-bbox="715 972 970 1023">Gramoxone (Paraquat)</td> <td colspan="2" data-bbox="970 972 1289 1023">There was no paraquat use since January 2017</td> </tr> <tr> <td data-bbox="715 1023 970 1052">Garlon (Triclophyr)</td> <td data-bbox="970 1023 1121 1052">145.70 liter</td> <td data-bbox="1121 1023 1289 1052">0.021421</td> </tr> <tr> <td data-bbox="715 1052 970 1104">Metsul 24 WP 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<p>4.6.3 Any use of pesticides shall be</p>	<p>There is no used of prophylactic use of pesticides in</p>	<p>Comply</p>																																																															

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	<p>all company estate. Pesticide is only used for last resort. For herbicide, the weed control always preceded with weed infestation survey to monitor the weed population and identify target species in order to formulate active ingredient dosage per Ha.</p>	
<p>4.6.4</p>	<p>The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p>	<p>Comply</p>
<p>4.6.5</p>	<p>Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>Comply</p>
<p>4.6.6</p>	<p>Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or</p>	<p>Comply</p>

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	<p>instructions enclosed on the containers (see criterion 5.3). - Major compliance -</p> <p>personal protective equipment/PPE (face shield, permeable gloves, apron and mask) was available and ready for use. Working instruction for pre-mixing, stacking and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken into the field as all spray solutions are pre-mixed in a designated area. Empty pesticide container was triple rinsed before sent for temporary hazardous waste storage. The company supplies two sets of overalls to all pesticide operators so that one can always be considered clean. Overalls are washed at the pesticide mixing areas in specially constructed wash areas so that sprayers and mixers do not need to take them home and therefore the risk of cross contamination with family members is reduced and eliminated.</p>	
<p>4.6.7</p>	<p>Application of pesticides shall be by proven methods that minimize risk and negative impacts. - Minor compliance -</p> <p>Pesticides used were mixed accordingly as per mixing instructions. Procedure no TTI/PROS/IMP/14 revision 01 dated on 1 December 2013 was established and approved related pesticides usage, storage, mixing and handling of container properly to minimise risk and impact. Applications of pesticide shall be approved by manager based on action plan from each FA (Field Assistant), reviewed by Field Head assistant. FA made pesticide plan referred to result of pest census. In Perlavian Estate, the calibration of spraying equipment (SA15) – annually, sample record seen: - in Division F.2 was conducted on 14 November 2017 covering of 9 equipments (SA15); - in Division F.4 was conducted on 26 November 2017 covering for 13 equipments (SA15). In Tolan Estate, calibration for spraying tools dated 20 February 2018, location in mixing area. The result recorded.</p>	<p>Comply</p>
<p>4.6.8</p>	<p>Pesticides may only be applied aerially where there is a documented justification. Surrounding communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -</p> <p>Not applicable. There was no aerial application of pesticide in Perlavian Estate and Tolan Estate.</p>	<p>Not Applicable N/A</p>
<p>4.6.9</p>	<p>Evidence of training on handling pesticide for workers and scheme smallholder (if any) shall be available. - Minor compliance -</p> <p>Records of training are kept in each estate for all workers who come into contact with pesticides this include Pesticide Mixers, pesticide Sprayers and any chemical handlers in the stores. The training data is available and centrally in all estates for whoever handles pesticides. There is a</p>	<p>Comply</p>

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	<p>minimum requirement of PPE that must be used in the handling and application of pesticides. PPE specifications are stated in the Management Guidelines and further demonstrated in training manuals. In Perlavian Estate, training record seen:</p> <ul style="list-style-type: none"> - Training on MSDS (material safety data sheet), dated 23 November 2017, attended by spraying applicator, supervisor and chemical storage officer; - Attendance list of socialization on Becano application in replanting area, dated 14 September 2017, was attended by 38 workers; - Training on use of SA15 for all spraying applicators, dated 15 November 2017. <p>In Tolan Estate, training on MSDS for spraying applicator, supervisor and chemical storage officer, dated 15 December 2017. Evident verified: training material, attendance list and photograph.</p>	
<p>4.6.10 Proof that pesticide waste has been handled as per legal regulations and understood by worker and manager, shall be demonstrated. - Minor compliance -</p>	<p>Based on visit in pesticides storage and chemical storekeeper in estates. In Perlavian Estate, (dated 26 March 2018) storekeeper has understood the procedure and re-use of ex-chemical empty container. The empty containers are triple rinsed before sent to hazardous waste storage and/or re-use as pre-mixed water container to the field.</p> <p>Waste storage was separately and clearly identified as follow: hazardous waste black colour, Organic waste green colour, non-organic waste blue colour and economical waste yellow colour. This identification has been properly understood by all workers.</p>	<p>Comply</p>
<p>4.6.11 Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available. - Major compliance -</p>	<p>The Organization has performed the annual medical records of pesticide operators, and follow-up treatment of medical results.</p> <p>Beside annual medical checkup, specific medical checkup was also done for pesticide and chemical operator at least once a year by external clinic "Klinik Spesialis Anugerah Ibu", record of medical checkup was evident as per record "formulir pemeriksaan medis pekerja pemakai pestisida/bahan kimia".</p> <p>Based on interview with spraying team and review Medical Surveillance record/result on sampled workers, doctor concluded there was no worker with signs of intoxication detected.</p> <p>In Perlavian Estate, special medical check (annually) for pesticide operators, fertilizer applicators, chemical storage officers, was conducted 26 July 2017, attended by 76 workers. The result of MCU has communicated to all workers, the evidence available e.g: "Sosialisasi Hasil MCU" on 13 March 2018.</p> <p>As in Tolan Estate, record of special medical check up for pesticides operators/handling by "Klinik Anugerah Ibu", dated 27 July 2017 attended by 34 workers and on 26 July 2017 was attended by 37 workers.</p>	<p>Comply</p>
<p>4.6.12 Records shall be available to show</p>	<p>Based on field visit (dated 26 March 2018) in division</p>	<p>Comply</p>

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<p>that spraying is not conducted by pregnant or breast-feeding women. - Major compliance -</p>	<p>2 block H12-13 (manuring activities) and in division 6 block B14 (Spraying), there are no pregnant worker. In Perlabian Estate, attendance list female sprayer – not pregnant and not breast-feeding - “Daftar Absensi Tenaga Kerja Wanita Tidak Hamil dan Menyusui” February 2018 – No pregnant. E.g: Mrs S****, Mrs E***, Mrs Su****, Mrs Ju****, Mrs L***.</p> <p>As for Tolan Estate, Based on visit sparying activity in division III block C26-27 (dated 28 March 2018), the all of team member of spaying application are male (N/A).</p>		
<p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>			
<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>There are no any change on policy related a health and safety from previous assessment (ASA-1.2).</p> <p>An Occupational Health and Safety Policy has been established and in place, issued and signed by the President Director dated 1 March 2014. In point 1 mentioned that the company supports the implementation of all relevant laws and regulations pf the Republic of Indonesia, and of applicable international agreements and standards. In poin 2.b mentioned that the company committed to provision of adequate resources fro effective implementation of the occupational healt and safety (OHS) program and procedure, including strict compliance reviews. The policy has communicated to all workers, e.g: Attendance list on Master Chift of OHS policy, dated 19 January 2018 in Perlabian POM for workers in Shift A (processing A).</p> <p>The company also has prepared the document of “Pedoman Sistem Management Keselamatan dan Kesehatan Kerja (SMK3)”, no TTI/PSMK3/01, revision 0, dated 1 July 2009. The document consist of:</p> <ol style="list-style-type: none"> 1. Commitment and Policy on OHS – document TTI/PROS/KOM/01 2. Program of OHS – document TTI/PROS/REN/02 <ol style="list-style-type: none"> a. Objective and Target Program on OHS b. Plan of hazared identification, risk assessment and control 3. Implementation of OHS – document: TTI/PROS/IMP/05 <ol style="list-style-type: none"> a. Respondibility and Emergency response b. OHS training and competency c. Communication d. OHS Reporting e. Procedure of handling incident, report and investigation related to incident and ill. 4. Monitoring and Evaluation – document TTI/PROS/IMP/27 <ol style="list-style-type: none"> a. Inspection and Measurement b. Audit of OHS management system 	<p>Comply</p>

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	<p>c. Corrective action and preventive action</p> <p>5. Management review and continuous improvement – document TTI/PROS.IMP/31</p> <p>POM and all estate have prepared the OHS Program as in Program P2K3 year 2018, such as:</p> <ul style="list-style-type: none"> - Safety committee (P2K3) meeting (monthly) - Report of P2K3 to manpower Agency in South Labuhanbatu Regency (three months bases) - Maintenance and inspection of OHS equipment, fire extinguisher, gydrant, first aid box (monthly) - Annual Medical check up - Inspection on using the PPE (monthly) - Review on risk assessment (annually) - Accident investigation (if any) - Fire Drill (annually) - Review and updated the legal and other requirement related to OHS; <p>Records of implementation and monitoring of effectiveness the OHS program available in indicator 4.7.3</p>	
<p>4.7.2</p> <p>A documented risk assessment shall be available and its implementation shall be recorded.</p> <p>- Major compliance -</p>	<p>The company has established the procedure of risk assessment under “Prosedur Bahaya dan Penilaian Risiko”, No.TTI/PROS/IMP/02, revision 01 dated 1 December 2013. The procedure covers the risk assessment process, resources, safety committee, emergency response plan, record and reporting, etc. The Perlavian POM has determined the document of risk assessment last review on 25 January 2018, covering all activities in Perlavian POM based on location/workplace, e.g: Security, Office and weighbridge, loading ramp, sterilizer, chain/capstand, hoisting crane, screw press, water treatment plant, workshop, laboratorium, biogas plant.</p> <p>Based on observing of Mill processing and field visit in plantation (activities: manuring, spraying, harvesting, transport of FFB, chemical warehouse) there were found the risk has controlled.</p> <p>The company also implemented the safe working permit for height, e.g: work permit for feeding and decreasing of fertilizer in warehouse, dated 21 March 2018.</p> <p>Tolan Estate has prepared the document of risk assessment as in “Penilaian Risiko”, last review on 24 March 2018. The risk assessment has been covering all activities in plantation.</p>	<p>Comply</p>
<p>4.7.3</p> <p>Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all</p>	<p>PT. Tolan Tiga Indonesia has kept the records of OHS Program and PPE training.</p> <p>In Perlavian POM records verified being:</p> <ul style="list-style-type: none"> - Report on emergency drill (simulation), dated 26 February 2018. Evident verified: attendance list, scenario, photograph, analysis and evaluation. - OHS training carried out on 26 February 2018, 	<p>Comply</p>

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<p>workers. - Major compliance -</p>	<p>attended by 19 workers of Processing B, laboratorium, godown and drivers.</p> <ul style="list-style-type: none"> - Inspection on using of PPE, dated 24 March 2018 in workshop, on 26 March 2018 in Perlabian POM shift A. <p>Based on visit at several area such as laboratory, workshop and processing have been seen proper PPE used by worker and available at location such as at area Perlabian Mill, Perlabian Estate and Tolan Estate. Record of license for operators, e.g:</p> <ul style="list-style-type: none"> • Operator overhead crane kelas III, namely Mr Supriono, license no: 14.25011-OPK3-PAA/IV/2014, valid until April 2019. • Steam vessel permit: Operator Pesawat Uap kelas II, namely Mr Sukerno, license no 6157.OPK3-PUBT-B.II/IV/2014, valid untl 3 April 2019. • Turbine machine permit: Operator Turbin Uap, namely Mr Adi Ardian, license no: 14.060.OP.TU.K3-PTP/IV/2014, valid until 29 April 2019. • Extension for boiler operator: Respond Letter on "Permohonan Sertifikasi (SIO)" boiler operator and enginee room operator, from Manpower Agency in South Labuatanbatu Regency, no 560/62/NAKER/II/2018 dated 20 March 2018. • Letter on application of certification for operator in POM (boiler operator and welder), letter no: 12/PLM-03/2018, dated 22 March 2018. <p>In Tolan Estate Record of handover PPE for harvesters, dated September 2017, item: AP boot (rubber boot). Furthermore, the inspection and training:</p> <ul style="list-style-type: none"> - Inspection checklist on using PPE (packing fertilizer and spraying), dated September 2017 - Simulation of emergency preparedness (fire drill), dated 10 February 2018. The evidencnt verified: scenario, attendance list, photograph. The emergency response plans are effective. - "Berita Acara Pemusnahan obat klinik yang kadaluarsa", dated 29 January 2018, e.g: ultrasonix geal (expiry date: December 2016), tramadol HCL 50ml injection (expired date November 2017), Saltam 2 mg (expired dated September 2017), Nephrolit (expired dated June 2017). - Muster Chift Field Work on Sosialization of OHS policy, risk assessment and using of PPE, dated 24 March 2018, location in division IV. - "Berita Acara" on re-filling the fire extinguisher (APAR), dated 24 February 2018, total re-filling 24 fire extinguisher. <p>Certificate for backhoe loader operator trained with "Pembinaan Teknik Keselamatan dan Kesehatan Kerja Pesawat Angkat dan Angkut", namely Mr. Sugeng Tuwono, License No.14.33240-OPK3-PAA/III/2014 dated 28 March 2014 valid until 28</p>	

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<p>4.7.4</p> <p>The responsible person(s) for occupational health and safety shall be identified and there shall be records of periodical meetings on health and safety issues.</p> <p>- Major compliance -</p>	<p>March 2019.</p> <p>Safety and Health Committee has been determined and approved by Ministry of Manpower.</p> <p>OHS related issues were discussed sufficiently with the fixed agenda indicated review of accident statistics and performance, inspection result, review of accident reporting system, review of committee member, review of inspection findings, training, policy and procedures, external audit action points (RSPO) and other matters.</p> <p>In Perlabian POM, the Safety Committee has established as per "Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Kabupaten Labuhan Batu Selatan No. Kep.14/P2K3/Naker/III/2018, dated 23 March 2018.</p> <ul style="list-style-type: none"> - OHS expert namely Mr. Muhammad Husni Rizki Lubis license as "Ahli Kesehatan dan Keselamatan Kerja" No.Reg.13095/PK3/AJ/12/2017/P1, valid 20 September 2020. - (monthly) Safety committee's minutes meeting – last meeting on 10th March 2018 with agenda: review of progress result of previous meeting, review of accident report, review of hazard identification result. Attended by 7 members. - Health and safety performance report - Laporan Triwulan P2K3 PT. Tolan Tiga Indonesia Perlabian POM to Manpower Agency in South Labuhanbatu Selatan for period October – December 2017, reported on 6 March 2018, letter no.09/PLM-03/2018. <p>In Tolan Estate, Safety Committee available as in "Surat Keputusan Kepala Dinas Tenaga Kerja Propinsi Sumatera Utara no: -7/DTK/SU/I/2018, dated January 2018.</p> <p>Safety Officer namely Mr.Muhammad Husni Rizki, license as "Ahli Keselamatan dan Kesehatan Kerja" No.Reg.13095/PK3A/12/2017/P1, dated 20 September 2017.</p>	<p>Comply</p>
<p>4.7.5</p> <p>A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.</p> <p>- Minor compliance -</p>	<p>There are no any change on procedure for emergency and work accident from previous assessment (ASA-1.2). A set of emergency response procedure is available.</p> <p>Accident response procedure under "Prosedur Penanganan, Pelaporan dan Penyelidikan Kecelakaan Kerja" No.TTI/PROS/IMP/25 dated 1 July 2009.</p> <p>First aid during accident under "Prosedur Pertolongan Pertama pada Kecelakaan" No.TTI/PROS/IMP/24.</p> <p>"Prosedur Tanggap Darurat" No.TTI/PROS/IMP/23 dated 1 July 2009, covering fire, earthquake, social unrest, etc.</p> <p>Emergency situation under "Instruksi Kerja Tanggap Darurat", dated 17 February 2017.</p> <p>The emergency response plan and readiness have been tested in Perlabian POM:</p> <ul style="list-style-type: none"> - Internal training/socialization on first aid using, 	<p>Comply</p>

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	<p>dated 26 February 2018, was attended by workers in processing, laboratory, dayworking, workshop.</p> <ul style="list-style-type: none"> - Daftar Periksa Kotak P3K (first aid checklist) – monthly, e.g: box no 01 location in Laboratorium last monitoring in March 2018. <p>In Tolan Estate, Simulation of emergency preparedness (fire drill), dated 10 February 2018. The evidence verified: scenario, attendance list, photograph.</p> <ul style="list-style-type: none"> - Internal training of first aider, dated 24 March 2018, location in Poliklinik Tolan Estate, was attended by 15 workers. - License for first aider, namely Mr. Roswadi, No.Reg. 560/033/DSTKT/P3K/2016, valid until 14 October 2019. <p>Monitoring record of first aid (box and portable) – monthly, e.g: in March 2018 there are 18 first aid kits, the condition are good.</p>	
<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3). - Minor compliance –</p>	<p>PT. Tolan Tiga Indonesia has been implemented the Medical Checkup covering all employees. All employees covered by social insurance as per government regulation, BPJS – covering health insurance, accident insurance and pension fund. This scheme applicable to the dependent of the worker. Company clinics are licensed to provide medical service that meets the insurance requirements</p> <p>In Perlakuan POM, General Medical Check (annually) carried out on 27-28 October 2017 by company doctor (No.Kep. 55/BINWASSK3-PNK3/KK/II/2016), for 43 workers.</p> <ul style="list-style-type: none"> - Special medical check (annually) for pesticide operators, fertilizer applicators, chemical storage officers, was conducted 26 July 2017, attended by 76 workers - Payment record of “BPJS Ketenagakerjaan”, code: 180300698076 for periode February 2018, value IDR xx,933,945. - Payment record of “BPJS Kesehatan”, BU code: 00385376, for period February 2018, value IDR xx,008,943. <p>In Tolan Estate, Payment record for BPJS Ketenagakerjaan, month February 2018, code: 180300813361, dated 19 March 2018, value IDR x.578.000. Payment record for BPJS Kesehatan, month February 2018, code: 180301087796, value IDR. xx.216.502.</p>	<p>Comply</p>
<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. - Minor compliance</p>	<p>All occupational injuries case was recorded in the “Laporan Kecelakaan Kerja” and summary monthly in the “Rekapitulasi Kecelakaan Kerja”. Based on procedure no TTI/PROS/IMP/25 revision 0 dated on 1 July 2009 shall be measure LTFR (lost time frequency rate)/AFR (Accident Frequency rate), RIR (Recordable injury rate), Incident Rate (IR) and Total Accident Rate (TAR).</p>	<p>Comply</p>

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	<p>In Perlabian POM, Based on record "Rekapitulasi Laporan Kehilangan Waktu Kerja tahun 2017", there are no accident reported (nil).</p> <p>In Perlabian Estate, "Rekapitulasi Kecelakaan Kerja year 2017, there are 14 accidents, with lost time are 30 days (in 2016 there were 30 days of lost time by accident). Sampled supervisor's investigation accidents report, dated 26 May 2017 namely Mr. Mj*****, the result of investigation evaluation and recommendation has been followed up.</p> <p>In Tolan Estate, recorded "Rekapitulasi Kecelakaan Kerja dan Laporan Kehilangan Hari Kerja" year 2017, there was 12 accidents reported with 15 days of lost time by accidents.</p> <ul style="list-style-type: none"> - In 2017 there is an accident (grade: major), the evident verifications: <ul style="list-style-type: none"> • "Laporan kecelakaan kerja tahap I (form 3KK1 – BPJS Ketenagakerjaan), dated 23 January 2018, namely Mr Yanardi (harvester) • Supervisor investigation of accident report, dated 23 January 2018. <p>The recommendation of result of investigation has been followed up, e.g: by installation the sign board (in block C30, division V), and the safety committee has added and reviewed the risk assessment and control.</p>	
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>		
<p>4.8.1</p> <p>Records of training program related to the aspects of RSPO Principles and Criteria shall be available.</p> <p>- Major compliance -</p>	<p>Training program Perlabian POM for 2018 has been prepared for all workers as per "Program Training 2018", dated 25 January 2018. The training program prepared based on training need identification. The program consist for example RSPO Supply Chain planned in February 2018; Occupational Health and Safety, Chemical knowledge, MSDS planned in March 2018; Training Crop Check FFB quality, Electrical Knowledge planned in April 2018; Mill processing (WI, HIRA, Environmental Aspect and Impact) planned in June and July 2018.</p> <p>Training Program Perlabian and Tolan Estate 2017 and 2018 are available and maintained. Training program of Perlabian and Tolan Estate for 2018 has been prepared for all workers (harvesters, sprayers, manuring teams), e.g. Program Training Tahun 2018". The training program prepared based on training need identification. The program consist for example: Manuring in January 2018, spraying and spraying tools calibration in February 2018, harvesting and FFB quality in March 2018, First Aid in March 2018, Ganoderma in April 2018.</p>	<p>Comply</p>
<p>4.8.2</p> <p>Records of training for each employee shall be maintained.</p> <p>- Minor compliance -</p>	<p>PT. Tolan Tiga Indonesia is able to demonstrate records of training for each employee, for examples. Perlabian POM:</p>	<p>Comply</p>

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	<ul style="list-style-type: none"> - Training attendance List of MSDS, on 21 March 2018, trainer Mr. D. Zakaria, attended by 6 employees. - Training attendance list of RSPO Suplly Chain, on 10 March 2018, trainer ENC Coordinator-GMO NS, attended by 7 employees. - Training attendance list of RSPO/ISPO/ISCC, on 3 March 2018, trainer Widiarny S., attended by 16 employees. - Training attendance list of Biogass, Global warning and biogass operation, on 20 February 2018, trainer PT KIS, attended by 19 employees. <p>Records of training for each employee is available under "Employee training and education record", e.g. Agus Prianto (Sortase), Sukerno (Sterilizer) and Hartono (Kernel Station).</p> <p>In Perlavian Estate, Refreshment Training of Harvesting and FFB quality on 12 December 2017, attended by all workers of Division I-VI.</p> <ul style="list-style-type: none"> - Training of safety driving and operator on 7 September 2017, attended by 35 workers. - Training of MSDS on 23 November 2017, attended by 9 supervisors. <p>Records of training for each employee is available under "Employee training and education record", e.g. Rizki Ari Yono (Land Application Operator).</p> <p>As per Tolan Estate, the Training of Manuring conducted on 19 January 2018, attended by 14 workers.</p> <ul style="list-style-type: none"> - Training of spraying and knapsack calibration conducted on 20 February 2018, attended by 13 personnel. - Training of harvesting and FFB quality conducted on 10 March 2018 attended by 30 workers from Division I, 14 workers from Division II, 25 workers from Division III, 21 workers from Division IV and 19 workers from Division V. <p>Records of training for each employee is available under "Employee training and education record", e.g. Herman Nasution, Mano Susilo, Isroil and Paiman Damanik (Harvester).</p>		
Principle 5: Environmental responsibility and conservation of natural resources and biodiversity			
Criterion 5.1:			
Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
5.1.1	Environmental impact assessment document(s) shall be available. - Major compliance -	The company has shown the environmental document and environmental permit, under: - AMDAL document is available and approved by Agriculture Ministry No.PEL.No.RC.220/472/B/III/1994, dated 17 March 1994. The impact assessment for Perlavian	Comply

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	<p>mill and its supply base was "Revisi Dokumen Rencana Pengelolaan Lingkungan (RKL) dan Rencana Pemantauan Lingkungan (RPL)" approved by "Surat Kepala Badan Pengendalian Dampak Lingkungan Daerah (Bapedalda) Kabupaten Labuhan Batu" No.660/326/BPDL-LB/Set/2006 dated 21 July 2006. All environmental impact assessments have been carried when and where appropriate. Records of all impact assessments carried out are readily available. All operational areas have undertaken reviews of the environmental impacts on at least an annual basis.</p> <ul style="list-style-type: none"> - "Adendum ANDAL, RKL-RPL, Perkebunan Kelapa Sawit, Pabrik Kelapa Sawit, Pabrik Kernel Crushing Plant (KCP) 20 ton/jam dan Pengolahan Limbah Cair PKS menjadi Biogas untuk Pembangkit Listrik (\pm3MW) PT. Tolan Tiga Indonesia di Desa Perkebunan Perlambian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan, Propinsi Sumatera Utara", approved by "Keputusan Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan No.660/55/BLH/2/2016", dated 16 November 2016. - "Izin Lingkungan Perkebunan Kelapa Sawit, Pabrik Kelapa Sawit, Pabrik Kernel Crushing Plant (KCP) 20 Ton/Jam dan Pengolahan Limbah Cair PKS menjadi Biogas untuk Pembangkit Listrik (+/- 3 MW) PT. Tolan Tiga Indonesia nomor 503/981/BPPTPM-LS.1/2016". <p>The environmental impact, both positive and negative impact were measured to mitigate the negative impact and increasing the positive impact, e.g.</p> <ul style="list-style-type: none"> - Air quality management: installation of dust collector, machinery service and maintenance, planting trees, road maintenance, all worker using ear plug. - Water quality: waste water management, Clean Development Mechanism (biogas plant) project, Land Application. - Biodiversity: maintenance of sign board of HCV area, maintenance of HCV boundary, planting trees, patrol in HCV area. - Economic wellbeing in the region: Community Development. - Job opportunity: for local communities. 		
<p>5.1.2</p>	<p>Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's management shall appoint the</p>	<p>PT. Tolan Tiga Indoneisa has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester), e.g RKL-RPL report semester II 2017 (Period July – December 2017) as per document "Laporan Pelaksanaan Rencana pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) semester II tahun 2017".</p>	<p>Comply</p>

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<p>responsible person(s) for the implementation of the document. - Minor compliance -</p>	<p>The evidence of submitted report to the government is available, e.g.</p> <ul style="list-style-type: none"> - Acceptance RKL/RPL report, letter no G/7/PLE/2018 to "Badan Lingkungan Hidup Kabupaten Labuhan Batu Selatan" on 21 March 2018, by BLH Labuhanbatu Selatan officer, namely Mrs Uswatun Karimah. - Tanda Terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL), no ID TTE: 1521774828-2171, dated 23 March 2018 <p>The company has appointed the Estate Manager and POM Manager whose responsible on implementation of the environmental management and monitoring plan, as mentioned in Job description, point 12. Responsible on implementation of sustainability system and the other applicable requirement in the organization.</p>	
<p>5.1.3 Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis. - Minor compliance –</p>	<p>Company has prepared the document of environment monitoring plan, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) as in "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) PT. Tolan Tiga Indonesia – Semester II, 2017". Implementation record of monitoring of environmental impact, such as:</p> <ul style="list-style-type: none"> - Air quality in mill and surrounding mill areas, dated 8 December 2017, conducted by Balai Keselamatan dan Kesehatan Kerja Medan, certificated number: 189 H/LHU-LK/BK3-MDN/XII/2017, the result is complying in "Peraturan Menteri Tenaga Kerja No.13 tahun 2011". - Air emission Boilers, dated 8 December 2017, conducted by Balai Keselamatan dan Kesehatan Kerja Medan, certificated number: 189 L1/LHU-LK/BK3-MDN/XII/2017, the result is complying with "Peraturan Menteri Lingkungan Hidup No.07 tahun 2007. - Air emission in power generator, dated 8 December 2017, conducted by Balai Keselamatan dan Kesehatan Kerja Medan, certificated number: 189 G1/LHU-LK/BK3-MDN/XII/2017, the result was complying with "Peraturan Menteri Lingkungan Hidup No. 13 tahun 2009". - Noise level was also monitored in each station which high noise level in Mill (boiler station, power house station, depericarping station, kernel plant station, cracking station, clarification station, workshop, pressing station, sterilizer station, loading ramp area), dated 8 December 2017, conducted by Balai Keselamatan dan Kesehatan Kerja Medan, certificated number: 189 A/LHU-LK/BK3-MDN/XII/2017, 	Comply

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	<ul style="list-style-type: none"> - POME waste water, conducted by independent laboratorium (PT Mutu Agung Lestari) dated 5 January 2018, report of testing number: 10605/SL/XII/17, the result was complying with "Keputusan Menteri Lingkungan Hidup No.28 tahun 2003". - Monitoring of water contamination in "Sumur Pantau Desa Lohsari" conducted by independent laboratorium (PT Mutu Agung Lestari) dated 11 September 2017, report of testing number: 7207/SL/VII/17, the result was complying with the national regulation "Peraturan Menteri Lingkungan Hidup No.28 Tahun 2003". - Surface water analysis in upstream and downstream Perlabian river, conducted by independent laboratorium (PT Mutu Agung Lestari) dated 8 January 2018, report of testing number: 8305/SL/XII/17 is complying with "Peraturan Pemerintah No.82 tahun 2001". - Biota Perairan testing, conducted by independent laboratorium (PT Mutu Agung Lestari) dated 22 November 2017, report of testing number: 9382/SL/XI/17. Method of sampling APHA 212st Edition – 2005, method 10500B. - Interview form with community for social aspect, dated 12 December 2017, sample seen of respondent Mr Edi Saputra (Perkebunan Tolan village), Mr Edy Fristono (Air Merah village), Mr Suyanto (Perkebunan Perlabian village), 	
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>		
<p>5.2.1</p>	<p>Record(s) on the results of High Conservation Value (HCV assessment) that includes both the planted area and the relevant wider landscape-level considerations (such as wildlife corridors) shall be available.</p> <p>- Major compliance -</p>	<p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Perlabian Estate in cooperation with "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved".</p> <p>The HCV assessment exercise carried out on 23-29 July 2009 with involvement from surrounding community through focuse group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly</p>

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	<p>cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> a. Area HCV 1 of 30.67 Ha in form of Reservoir Pond, whereby overlapping with; b. Area HCV 4 of 30.67 Ha in form of Reservoir Pond. c. Area Potency HCV 1 and HCV 4 of 188.16 Ha in form of riparian zone of Alangan III River, Tolan River and Perlabian River. Note: Potency HCV means HCV that might present inside planted area; as recommended by YASBI, potency HCV becomes HCV after the planted area being replanted. Potency HCV in planted area treated same as HCV area, whereby no chemical regime, upkeep, etc. d. Area HCV 6 of 3.45 Ha in form of graveyard In Division I (Block L08), Division II (Block I09), Division III (Block E05) and Division V (Block B12 dan E17). <p>Total HCV Area was 59.38, comprise of area of HCV 1 (overlapping with) and HCV 4 of 30.67 Ha; and HCV 6 of 3.45 Ha. An additional HCV 1 and 4 of 25.26 Ha comes from potency HCV.</p> <p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Tolan Estate in cooperation with "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved".</p> <p>The HCV assessment exercise carried out on 29-31 July 2009 with involvement from surrounding community through focuse group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> - Area HCV 1 of 32.99 Ha in form of forested land, riparian to Kwan Heng Lake and end of ex- 	

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	<p>airstrip;</p> <ul style="list-style-type: none"> - Area HCV 4 of 50.78 Ha in form of riparian to water spring, riparian to Kwan Heng Lake, and hilly area in block F36. - Area Potency HCV 1 of 248.18 Ha in form of riparian zone to Perlavian River, riparian zone to Tolan River, riparian zone Sisumut River, riparian zone of Merbau/Sosopan River. Note: Potency HCV means HCV that might present inside planted area; as recommended by YASBI, potency HCV becomes HCV after the planted area being replanted. Potency HCV in planted area treated same as HCV area, whereby no chemical regime, upkeep, etc. - Area HCV 6 of 0.19 Ha in form of graveyard in Division II (Block E10), Division V (Block C33). <p>Total HCV Area was 55.99 Ha comprise of HCV 1 on 32.99 Ha and (some overlapping with) HCV 4 of 50.78 Ha; and area HCV 6 of 0.19 Ha. HCV 1, 4 and 6 of 51.06 Ha, and additional HCV 1 of 4.93 Ha from potency HCV 1.</p>	
<p>5.2.2 Where rare, threatened or endangered (RTE) species and or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected to maintain or enhance them shall be implemented through a management plan. - Major compliance -</p>	<p>Based on the HCV assessment 2009 for Perlavian Estate, there are some flora and fauna species found. Plants/flora: 95 species of plants/flora with no status under CR (based on IUCN Redlist), or CITES Appendix I or protected under "Peraturan Pemerintah No. 7 tahun 1999". The type of plants/flora identified: <i>Beringin</i> (<i>Ficus benjamina</i>), <i>Asam-asaman</i> (<i>Phyllanthus amarus</i>), <i>Jambu Biji</i> (<i>Psidium guajava</i>), <i>Manii</i> (<i>Maesopsis manii</i>), <i>Jati</i> (<i>Tectona grandis</i>), <i>Cemara</i> (<i>Casuarina equisetifolia</i>), <i>Nangka</i> (<i>Artocarpus heterophyllus</i>), <i>Melinjo</i> (<i>Gnetum gnemon</i>), <i>Coklat</i> (<i>Theobroma cacao</i>), <i>Durian</i> (<i>Durio zibethinus</i>), <i>Cempedak</i> (<i>Artocarpus integer</i>).</p> <p>Animals/fauna: Mammals; identified 5 mammals species such as <i>Babi Hutan</i> (<i>Sus verucosus</i>), <i>Beruk</i> (<i>Macaca nemestrina</i>), <i>Monyet Ekor Panjang</i> (<i>Macaca fascicularis</i>). From the identified list, there was no mammals status under CR (based on IUCN Redlist), or CITES Appendix I or protected under "Peraturan Pemerintah No. 7 tahun 1999".</p> <p>Reptils and amphibia: Identified 9 species such as <i>Ular Gendang</i> (<i>Python curtus</i>), <i>Ular Jali</i> (<i>Ptyas korros</i>), <i>Biawak</i> (<i>Varanus salvator</i>). From the identified list, there was reptile or amphibia with status under CR (based on IUCN Redlist), or CITES Appendix I or protected under "Peraturan Pemerintah No. 7 tahun 1999".</p> <p>Bird/Aves: identified 27 species such as <i>Perkutut</i> (<i>Geopelia striata</i>), <i>Bubut</i> (<i>Centropus bengalensis</i>), <i>Cucuk Urang</i> (<i>Halcyon cyanoventris</i>), <i>Bangau Putih</i> (<i>Bubulcus ibis</i>), <i>Ayam hutan</i> (<i>Gallus gallus</i>), <i>Kepodang</i> (<i>Oriolus chinensis</i>). From the identified list, there was no bird with status under CR (based on IUCN Redlist). 1 species with status Vu under CITES Appendix I. And 3 species with status protected under "Peraturan Pemerintah No. 7 tahun 1999": <i>Tengkek</i></p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>(<i>Halcyon pileata</i>), <i>Bangau Putih</i> (<i>Bubulcus ibis</i>) dan <i>Cucuk Urang</i> (<i>Halcyon cyaniventris</i>).</p> <p>Implementation and monitoring of HCV for Perlabian Estate reported on the Implementation and Monitoring of HCV in 2017. In 2017 there is a change of identity of HCV potential become HCV actual for 2.11 Ha. This is due to replanting activities that have been considering the presence of HCV where previously a potential of HCV, then turned into HCV actual.</p> <p>Based on the verification of documents Identification of HCV in 2009 states that no protected areas around the concession area of PT. Tolan Tiga Indonesia, which has connectivity with a concession area.</p> <p>Based on the results of monitoring in 2017, the described species of flora and fauna are protected.</p> <p>The company has prepared a program for the management of HCV, such as:</p> <ol style="list-style-type: none"> Monitoring of HCV including the presence of protected fauna and flora. Socialization information related to HCV Upkeep the plants in HCV areas Monitoring/replacement the signboard of HCV Training for conservation officers, <p>Perlabian Estate has realized the HCV program 2017, e.g:</p> <ul style="list-style-type: none"> - Monitoring of flora and fauna carried out every month and the results are set in "HCV monitoring checklist" no Doc: ENS/DOC.08. revision 03, 2011. - Training for conservation officer, on 12 December 2017 - Mointoring the signdboard of HCV performed consistently every month, e.g repair the signboard of HCV on March 30, 2017 and November 23, 2017. <p>Based on field visit in block I13/14, Divion II Perlabian Estate (Sempadan Sungai Tolan 2) shown these HCV area has planted with woody plants, e.g: Trembesi (<i>Samanea saman</i>), Bambu (<i>Bambusa sp</i>), Saga (<i>Adenanthera pavonina</i>), Salam (<i>Eugenia aperculata</i>), Gmelina (<i>Gmelina arborea</i>).</p> <p>Based on field observation in block N15, Divison 1 (PLE) which become part of 2017 replanting activity, no replanting in radius 50 meters to the both side of the river; further verification against replanting document, the area have been excised from planted hectarage.</p> <p>Based on the HCV assessment 2009 for Tolan Estate, there are some flora and fauna species found. Plants/flora: 57 species of plants/flora with no status under CR (based on IUCN Redlist), or CITES Appendix I or protected under "Peraturan Pemerintah No. 7 tahun 1999". The type of plants/flora identified: <i>Beringin</i> (<i>Ficus benjamina</i>), <i>Asam-asaman</i> (<i>Phylantus</i></p>	

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	<p>amarus), <i>Jambu Biji</i> (<i>Psidium guajava</i>), <i>Manii</i> (<i>Maesopsis manii</i>), <i>Jati</i> (<i>Tectona grandis</i>), <i>Cemara</i> (<i>Casuarina equisetifolia</i>), <i>Nangka</i> (<i>Artocarpus heterophyllus</i>), <i>Rambutan</i> (<i>Nephelium lappaceum</i>), <i>Waru</i> (<i>Hibiscus</i> sp).</p> <p>Animals/fauna: Mammals; identified 5 mammals species such as <i>Babi Hutan</i> (<i>Sus verucosus</i>), <i>Beruk</i> (<i>Macaca nemestrina</i>), <i>Monyet Ekor Panjang</i> (<i>Macaca fascicularis</i>). From the identified list, there was no mammals status under CR (based on IUCN Redlist), or CITES Appendix I. However, one species protected under "Peraturan Pemerintah No. 7 tahun 1999" which is <i>Musang</i> (<i>Paradoxurus hermaphroditus</i>).</p> <p>Reptils and amphibia: Identified 6 species such as <i>Ular Cobra</i> (<i>Naja sputatrix</i>), <i>Ular Jali</i> (<i>Ptyas korros</i>), <i>Biawak</i> (<i>Varanus salvator</i>). From the identified list, there was reptile or amphibia with status under CR (based on IUCN Redlist), or CITES Appendix I or protected under "Peraturan Pemerintah No. 7 tahun 1999".</p> <p>Bird/Aves: identified 17 species such as <i>Perkutut</i> (<i>Geopelia striata</i>), <i>Bubut</i> (<i>Centropus bengalensis</i>), <i>Cucuk Urang</i> (<i>Halcyon cyanoventris</i>), <i>Bangau Putih</i> (<i>Bubulcus ibis</i>), <i>Ayam hutan</i> (<i>Gallus gallus</i>), <i>Kepodang</i> (<i>Oriolus chinensis</i>). From the identified list, there was no bird with status under CR (based on IUCN Redlist). 1 species with status Vu under CITES Appendix I. And one species with status protected under "Peraturan Pemerintah No. 7 tahun 1999": <i>Cucuk Urang</i> (<i>Halcyon cyanoventris</i>).</p> <p>In Tolan Estate, company has prepared a program for the management of HCV, such as:</p> <ol style="list-style-type: none"> HCV monitoring including wildlife monitoring (recorded on "Checklist HCV dan Form Pemantauan Satwa") HCV information dissemination. Maintain local tree species for HCV area. <p>Tolan Estate has realized the program Monitoring of flora and fauna carried out every month and the results are set in "HCV monitoring checklist" no Doc: ENS/DOC.08. revision 03, 2011. Based on the results of monitoring in 2017 described species of flora and fauna are protected.</p> <p>Based on field inspection to block D19, E18 (HCV 6) shows that company consistent to maintain signboard of HCV identification. No sign of tree standing damage, animal trap in the area.</p>	
<p>5.2.3</p>	<p>Program(s) to socialize the status of protected, rare, threatened or endangered (RTE) to all workers shall be available, including records of appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these</p>	<p>Comply</p>

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<p>species. - Minor compliance –</p>	<p>in the area of PT. Tolan Tiga Indonesia. Based on document verification against “Dokumen Muster Chit Field Work Divisi 2, Perlabian Estate” dated 15 March 2018 shows that company have disseminated the HCV and environment protection to 117 workers.</p>	
<p>5.2.4 Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan. - Minor compliance –</p>	<p>As outlined in the indicator 5.2.3 which states that the company has drafted a management plan and monitoring of HCV in which the results are available in the “Report on the Implementation and Monitoring of HCV” and evaluated in the Report of the RKL-RPL annually.</p> <p>Management of HCV have also been included in the plan and the operational implementation of replanting in PT. Tolan Tiga Indonesia, e.g: based on the results of field observations in Block N15, Div I and Block I13/14, Division II Perlabian Estate showed that the area of the HCV no activities replanting in radius ± 50 meters either side of the river, and has planted woody plants such as Mahogany (<i>Swietenia mahogany</i>), Trembesi (<i>Samanea saman</i>), Saga (<i>Adenanthera pavonina</i>), Salam (<i>Eugenia aperculata</i>), Teak (<i>Tectona grandis</i>).</p>	<p>Comply</p>
<p>5.2.5 Where HCV areas overlapped with an identified local community’s land, there shall be evidence of a negotiated agreement that optimally safeguard their HCVs and the local community’s rights. - Minor compliance –</p>	<p>Based on the verification of legal documents, identification of HCV as well as the area of the statement indicates that the entire HCV area HCV was under company concession. Based on the results of public consultation with relevant agencies as well as the surrounding rural communities, stating that the HCV area under control of PT. Tolan Tiga Indonesia.</p>	<p>Comply</p>
<p>Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>		
<p>5.3.1 A documented identified source of all waste and pollution, shall be available. - Major compliance -</p>	<p>Company has maintained a document of identification source of all waste and pollution as in “Rencana Pengelolaan Limbah PT. Tolan Tiga Indonesia”, last review on 8 September 2017, such as:</p> <ul style="list-style-type: none"> - “Limbah padat dan limbah tajam poliklinik” – solid waste and sharp waste from clinic; - “Limbah cair rumah tangga” - black water and grey water from domestic disposal; - “Limbah padat rumah tangga” - organic and anorganic waste from domestic disposal; - “Limbah bahan berbahaya beracun” – hazardous waste from power generator and vehicle such as waste lubricants, old battery and waste oil filter; - “Kemasan bekas bahan kimia ukuran kecil dan kemasan jerigen bekas bahan kimia” – empty chemical container/jerry can; - “Karung bekas pupuk” – empty fertilizer inner bag; <p>“Wadah toner photocopy, cartridge printer” – photocopy machine toner and printer cartridges.</p>	<p>Comply</p>

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<p>5.3.2 There shall be evidence that all chemicals and their empty containers are disposed of responsibly. - Major compliance -</p>	<p>All chemical and hazardous waste from Perlabian POM and Perlabian Estate are stored in temporary hazardous waste storage in Perlabian Estate and the chemical and hazardous water from Tolan Estate is stored in temporary hazardous waste storage. The storage permit, such as:</p> <ol style="list-style-type: none"> 1. "Keputusan Kepala Badan Pelayanan Perizinan Terpadu dan Penanaman Modal Kabupaten Labuhanbatu Selatan No.503/318/BPPTPM-LS/P.I/2015 tentang Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT. Tolan Tiga Indonesia Kebun Tolan" dated 22 June 2015 and valid for 5 years. Location in Tolan Estate. 2. "Keputusan Kepala Badan Pelayanan Perizinan Terpadu dan Penanaman Modal Kabupaten Labuhanbatu Selatan No.503/319/BPPTPM-LS/P.I/2015 tentang Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT. Tolan Tiga Indonesia Kebun/PKS Perlabian" dated 22 June 2015 and valid for 5 years. Location in Pelabihan Estate. 3. "Surat Perjanjian Kerjasama No 232/TTI-ABS/SPK-LB3/III/2018 on agrrement of handing on hazardous waste P Sumut, dated 7 March 2018. 4. Izin Pengelolaan Limbah Bahan Berbahaya dan Beracun untuk Kegiatan Pengumpulan Limbah B3 berdasarkan SK Menteri Kehutanan dan Lingkungan Hidup nomor SK.353.Menlhk.Setjen/2015, dated 31 August 2015 valid until 5 years. 5. Izin Pengumpul Limbah Bahan Berbahaya dan Beracun berdasarkan SK Gubernur Sumatera Utara nomor 188.44/452/KPTS/2014, dated 19 June 2014 valid until 5 years. <p>Based on visit in the storage of hazardous waste (on 26 March 2018) in Perlabian Estate and Tolan Estate (on 28 March 2018) area confirmed appropriate storage have been provided with consideration of safety and environmental aspects such as second containment, spill-kit, warning signs, PPE, firefighting, alarm and first-aid kit. Review of records showed all hazardous waste has been identified and properly monitored, such as used oil, used oil filter, used batteries, empty chemical container from Perlabian Estate and Mill activities, contaminated materials, etc. Monitoring was recorded in document "Neraca Limbah B3".</p>	<p>Comply</p>
<p>5.3.3 A documented waste management plan to avoid or reduce pollution and its implementation shall be available. - Minor compliance -</p>	<p>Company has maintained Environmental Management and Monitoring Plan as to comply with environmental requirements.</p> <p>The company also has shown the document of "Penanganan Limbah untuk Mencegah Pencemaran terhadap Lingkungan", e.g: "Prosedur pengelolaan limbah klinik" No.SOP/01/CD revision 02, December</p>	<p>Comply</p>

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	<p>2015, for the management of clinical waste/biohazard.</p> <p>Perlabian POM and Estate have managed the disposal to third party licensed waste collector (PT. Amindy Barokah) on 3 months base. The Manifest documents and receipts were available and properly recorded, e.g:</p> <ul style="list-style-type: none"> - Berita Acara Serah Terima Barang Limbah Bahan Berbahaya dan Beracun nomor 20/PLE/2018, dated 14 February 2018 to PT. Amindy Barakah SUMUT, consist of: oil used (803 liter), battery used (84 kg), fuel filter used (151,6 Kg), chemical container used (15 kg), laboratorium waste (7.7 kg). - Manifest no AVT 0004549, item oil used (803 liter) dated 14 February 2018. - Manifest no AVT Accu used (84 kg) dated 14 February 2018. - Laporan Pengelolaan Limbah Bahan Berbahaya dan Becarun (3 months base) to Environmental Agency in Labuhanbatu Selatan for period Oktober – December 2017, was sent on 16 January 2018 as per letter no G/01/PLE/2018. <p>As for Tolan Estate, the minute "Berita Acara Serah Terima Barang – Limbah Bahan Berbahaya dan Beracun (B3)" to PT. Amindy Barakah, nomor 05/TLE/2018, dated 14 February 2018, consist of eks pesticides containment (32.55 Kg), medical waste (37.4 Kg)</p> <p>Manifest no AVT 0004556, dated 14 February for ex-pesticides containment (32.55 Kg).</p> <p>Report of hazardous waste management (three months base) to Environmental Agency in Labuhanbatu Selatan for periode October – December 2017, reported on 5 January 2018.</p>		
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>			
<p>5.4.1</p>	<p>A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored.</p> <p>- Minor compliance –</p>	<p>To reduce fossil fuel use; Program: transporation/fleet management; target reduce fuel use 2017:156,000 liters; timeline: January – December 2017; actual 2017 – use of fuel 2016 was 1.73 liters/MT FFB, use of fuel 2017 was 1.63 liters/MT FFB;</p> <p>Program: conduct checking and regular maintenance for all vehicle; target: regular vehicle check; timeline: January – December 2017; actual 2017 – all vehicle maintained.</p> <p>Program: Road maintenance; target: road maintenance as planned; timeline: January – December 2017; actual 2017 – road maintenance 595,710 meters (out of 207,600 meters)</p> <p>PT. Tolan Tiga Indonesia have prepared an efficiency plan, reducing the use of fossil fuel in estate and mill operation. The plan for Perlabian POM was to optimized the use of shell and fiber – and monitor the</p>	<p>Comply</p>

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	<p>energy generation compared to the HSD fuel used. Calculation for Fiber:</p> <table border="1" data-bbox="715 450 1294 882"> <thead> <tr> <th>Year 2017</th> <th>FFB Processed (tons)</th> <th>Fruit Fibers (MT)</th> <th>Net Calorific Value of Fiber (2300 Kcal/kg)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>18,835</td><td>2,586</td><td>5,948,013,913</td></tr> <tr><td>Feb</td><td>13,302</td><td>1,803</td><td>4,148,635,557</td></tr> <tr><td>Mar</td><td>16,139</td><td>2,106</td><td>4,844,388,884</td></tr> <tr><td>Apr</td><td>14,244</td><td>1,930</td><td>4,439,182,491</td></tr> <tr><td>May</td><td>15,621</td><td>2,149</td><td>4,943,935,678</td></tr> <tr><td>Jun</td><td>12,940</td><td>1,766</td><td>4,062,609,383</td></tr> <tr><td>Jul</td><td>18,788</td><td>2,562</td><td>5,894,346,102</td></tr> <tr><td>Aug</td><td>18,940</td><td>2,560</td><td>5,889,828,680</td></tr> <tr><td>Sep</td><td>18,867</td><td>2,601</td><td>5,984,340,407</td></tr> <tr><td>Oct</td><td>18,786</td><td>3,058</td><td>7,034,291,997</td></tr> <tr><td>Nov</td><td>19,686</td><td>3,096</td><td>7,122,446,852</td></tr> <tr><td>Dec</td><td>16,759</td><td>2,326</td><td>5,350,249,786</td></tr> <tr><td></td><td>202,912</td><td>28,548</td><td>65,662,249,730</td></tr> </tbody> </table> <p>Calculation for Shell:</p> <table border="1" data-bbox="715 936 1294 1368"> <thead> <tr> <th>Year 2017</th> <th>FFB Processed (tons)</th> <th>Shell (MT)</th> <th>Net Calorific Value of shell (3400 Kcal/kg)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>18,835</td><td>1,030</td><td>3,502,997,649</td></tr> <tr><td>Feb</td><td>13,302</td><td>661</td><td>2,247,776,185</td></tr> <tr><td>Mar</td><td>16,139</td><td>660</td><td>2,244,413,521</td></tr> <tr><td>Apr</td><td>14,244</td><td>626</td><td>2,130,921,549</td></tr> <tr><td>May</td><td>15,621</td><td>735</td><td>2,501,648,949</td></tr> <tr><td>Jun</td><td>12,940</td><td>604</td><td>2,054,661,945</td></tr> <tr><td>Jul</td><td>18,788</td><td>900</td><td>3,059,904,393</td></tr> <tr><td>Aug</td><td>18,940</td><td>867</td><td>2,949,460,130</td></tr> <tr><td>Sep</td><td>18,867</td><td>883</td><td>3,002,264,544</td></tr> <tr><td>Oct</td><td>18,786</td><td>1,132</td><td>3,851,539,753</td></tr> <tr><td>Nov</td><td>19,686</td><td>1,055</td><td>3,587,702,021</td></tr> <tr><td>Dec</td><td>16,759</td><td>792</td><td>2,695,236,094</td></tr> <tr><td></td><td>202,912</td><td>9,949</td><td>33,828,526,733</td></tr> </tbody> </table> <p>Record of efficiency</p> <table border="1" data-bbox="715 1422 1177 1832"> <thead> <tr> <th>Year 2017</th> <th>Grand Total NCV</th> <th>Equal to HSD Fuel (NCV 10500 Kcal/kg)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>9,451,011,562</td><td>900,096</td></tr> <tr><td>Feb</td><td>6,396,411,742</td><td>609,182</td></tr> <tr><td>Mar</td><td>7,088,802,405</td><td>675,124</td></tr> <tr><td>Apr</td><td>6,570,104,040</td><td>625,724</td></tr> <tr><td>May</td><td>7,445,584,627</td><td>709,103</td></tr> <tr><td>Jun</td><td>6,117,271,328</td><td>582,597</td></tr> <tr><td>Jul</td><td>8,954,250,495</td><td>852,786</td></tr> <tr><td>Aug</td><td>8,839,288,811</td><td>841,837</td></tr> <tr><td>Sep</td><td>8,986,604,951</td><td>855,867</td></tr> <tr><td>Oct</td><td>10,885,831,750</td><td>1,036,746</td></tr> <tr><td>Nov</td><td>10,710,148,873</td><td>1,020,014</td></tr> <tr><td>Dec</td><td>8,045,485,880</td><td>766,237</td></tr> <tr><td></td><td>99,490,796,463</td><td>9,475,314</td></tr> </tbody> </table> <p>Estimated 9,475 tons of HSD fuel was saved for process in Perlavian POM in 2017.</p>	Year 2017	FFB Processed (tons)	Fruit Fibers (MT)	Net Calorific Value of Fiber (2300 Kcal/kg)	Jan	18,835	2,586	5,948,013,913	Feb	13,302	1,803	4,148,635,557	Mar	16,139	2,106	4,844,388,884	Apr	14,244	1,930	4,439,182,491	May	15,621	2,149	4,943,935,678	Jun	12,940	1,766	4,062,609,383	Jul	18,788	2,562	5,894,346,102	Aug	18,940	2,560	5,889,828,680	Sep	18,867	2,601	5,984,340,407	Oct	18,786	3,058	7,034,291,997	Nov	19,686	3,096	7,122,446,852	Dec	16,759	2,326	5,350,249,786		202,912	28,548	65,662,249,730	Year 2017	FFB Processed (tons)	Shell (MT)	Net Calorific Value of shell (3400 Kcal/kg)	Jan	18,835	1,030	3,502,997,649	Feb	13,302	661	2,247,776,185	Mar	16,139	660	2,244,413,521	Apr	14,244	626	2,130,921,549	May	15,621	735	2,501,648,949	Jun	12,940	604	2,054,661,945	Jul	18,788	900	3,059,904,393	Aug	18,940	867	2,949,460,130	Sep	18,867	883	3,002,264,544	Oct	18,786	1,132	3,851,539,753	Nov	19,686	1,055	3,587,702,021	Dec	16,759	792	2,695,236,094		202,912	9,949	33,828,526,733	Year 2017	Grand Total NCV	Equal to HSD Fuel (NCV 10500 Kcal/kg)	Jan	9,451,011,562	900,096	Feb	6,396,411,742	609,182	Mar	7,088,802,405	675,124	Apr	6,570,104,040	625,724	May	7,445,584,627	709,103	Jun	6,117,271,328	582,597	Jul	8,954,250,495	852,786	Aug	8,839,288,811	841,837	Sep	8,986,604,951	855,867	Oct	10,885,831,750	1,036,746	Nov	10,710,148,873	1,020,014	Dec	8,045,485,880	766,237		99,490,796,463	9,475,314	
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May	15,621	2,149	4,943,935,678																																																																																																																																																									
Jun	12,940	1,766	4,062,609,383																																																																																																																																																									
Jul	18,788	2,562	5,894,346,102																																																																																																																																																									
Aug	18,940	2,560	5,889,828,680																																																																																																																																																									
Sep	18,867	2,601	5,984,340,407																																																																																																																																																									
Oct	18,786	3,058	7,034,291,997																																																																																																																																																									
Nov	19,686	3,096	7,122,446,852																																																																																																																																																									
Dec	16,759	2,326	5,350,249,786																																																																																																																																																									
	202,912	28,548	65,662,249,730																																																																																																																																																									
Year 2017	FFB Processed (tons)	Shell (MT)	Net Calorific Value of shell (3400 Kcal/kg)																																																																																																																																																									
Jan	18,835	1,030	3,502,997,649																																																																																																																																																									
Feb	13,302	661	2,247,776,185																																																																																																																																																									
Mar	16,139	660	2,244,413,521																																																																																																																																																									
Apr	14,244	626	2,130,921,549																																																																																																																																																									
May	15,621	735	2,501,648,949																																																																																																																																																									
Jun	12,940	604	2,054,661,945																																																																																																																																																									
Jul	18,788	900	3,059,904,393																																																																																																																																																									
Aug	18,940	867	2,949,460,130																																																																																																																																																									
Sep	18,867	883	3,002,264,544																																																																																																																																																									
Oct	18,786	1,132	3,851,539,753																																																																																																																																																									
Nov	19,686	1,055	3,587,702,021																																																																																																																																																									
Dec	16,759	792	2,695,236,094																																																																																																																																																									
	202,912	9,949	33,828,526,733																																																																																																																																																									
Year 2017	Grand Total NCV	Equal to HSD Fuel (NCV 10500 Kcal/kg)																																																																																																																																																										
Jan	9,451,011,562	900,096																																																																																																																																																										
Feb	6,396,411,742	609,182																																																																																																																																																										
Mar	7,088,802,405	675,124																																																																																																																																																										
Apr	6,570,104,040	625,724																																																																																																																																																										
May	7,445,584,627	709,103																																																																																																																																																										
Jun	6,117,271,328	582,597																																																																																																																																																										
Jul	8,954,250,495	852,786																																																																																																																																																										
Aug	8,839,288,811	841,837																																																																																																																																																										
Sep	8,986,604,951	855,867																																																																																																																																																										
Oct	10,885,831,750	1,036,746																																																																																																																																																										
Nov	10,710,148,873	1,020,014																																																																																																																																																										
Dec	8,045,485,880	766,237																																																																																																																																																										
	99,490,796,463	9,475,314																																																																																																																																																										
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>																																																																																																																																																												
<p>5.5.1</p>	<p>Records of land clearing with zero</p>	<p>No open burning was noted during field visit and interviewed with local communities and workers.</p>	<p>Comply</p>																																																																																																																																																									

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<p>burning shall be available, referring to the ASEAN Policy on Zero Burning (2003) or other recognised techniques based on the existing regulations. - Major compliance -</p>	<p>"Prosedur Pencegahan dan Pengendalian Kebakaran Lahan" No.ENC/SOP/10 dated 1 February 2014 for prevention and control of fire.</p> <p>The company has prepared the procedure no SOP/OilPalm/ESD, year 2009; tentang Penanaman Kelapa Sawit poin 3.1.3 mentioned "Dalam pembukaan lahan, perusahaan mempunyai kebijakan yang ramah lingkungan sesuai dengan prinsip-prinsip dalam RSPO. Sejalan dengan hal tersebut perusahaan menetapkan metode Zero Burning".</p> <p>Tolan Estate, data verified:</p> <ul style="list-style-type: none"> - Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Kabupaten Labuhanbatu Selatan Nomor KEP.-7/DTK/SIU/I/2018 tentang Pengesahan Tim Tanggap Darurat dan Badan Koordinator Anti Kebakaran (Bakortiba), dated 12 January 2018. - Fires patrol/monitoring of land fire occurrence recorded in "Buku Pemantauan Kebakaran Lahan". E.g: in Desember 2017, January-March 2018 are reported "Nihil" – nil; - Replanting Program, available: <table border="1" data-bbox="756 1086 1291 1274"> <thead> <tr> <th>Replanting Program</th> <th>Block</th> <th>Total Ha</th> </tr> </thead> <tbody> <tr> <td rowspan="2">2021</td> <td>E10-12A</td> <td>68.74</td> </tr> <tr> <td>F07-14</td> <td>104.59</td> </tr> <tr> <td rowspan="4">2022</td> <td>94D11-13</td> <td>72.58</td> </tr> <tr> <td>94E09A</td> <td>9.82</td> </tr> <tr> <td>94E13-14</td> <td>34.06</td> </tr> <tr> <td>94C11-12</td> <td>51.15</td> </tr> </tbody> </table> <p>Perlabian Estate, data verified "Surat Perjanjian Kerja No. 10/GMO-PLE/TG/VI/2017, antara PT. Tolan Tiga Indonesia dengan CV Tua Gabe tentang Replanting OP 2018", dated 1 June 2017. The felling and chipping during replanting was using mechanical method.</p>	Replanting Program	Block	Total Ha	2021	E10-12A	68.74	F07-14	104.59	2022	94D11-13	72.58	94E09A	9.82	94E13-14	34.06	94C11-12	51.15	
Replanting Program	Block	Total Ha																	
2021	E10-12A	68.74																	
	F07-14	104.59																	
2022	94D11-13	72.58																	
	94E09A	9.82																	
	94E13-14	34.06																	
	94C11-12	51.15																	
<p>5.5.2 Where fire has been used for eradication of pest during replanting, the records of the analysis of the use of fire and permit from the authorised agency shall be available. - Minor compliance -</p>	<p>No use of fire for eradication of pest or use of fore during replanting. The felling and chipping during replanting was using mechanical method.</p>	<p>Comply</p>																	
<p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>																			
<p>5.6.1 Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent, shall be available. (see Criterion 4.4) - Major compliance -</p>	<p>The company has developed pollution and emission reduction plan. The plan covers planning, implementing plans and monitoring activities generating pollution and emission. PT. Tolan Tiga Indonesia's plantation are located on 100% mineral soil. POME application/Land application permitted for plantation in mineral soil. Identification of pollution and emission sources recorded under Environmental Aspect & Impact List (Daftar Aspek & Pengaruh Lingkungan). The</p>	<p>Comply</p>																	

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	<p>identification listed all relevant activities that generate pollution and emission from office, plantations, palm oil mill, mill effluent treatment up to workers activities.</p> <p>Perlabian POM: Assessment of aspect and impact, including the source of polluton and emission as in "Environmental Aspect & Impact List No.PLPOM-EMS/110111/001" latest review January 2018.</p>	
<p>5.6.2</p>	<p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them implemented. - Major compliance -</p> <p>Perlabian Estate have created identification source of pollutant available in the "Environmental Aspect & Impact List", while the source of green house gasses identified under "Inventarisasi Sumber Emisi Gas Rumah Kaca" from use of anorganic fertilizer, use of agrochemical (pesticide and herbicide) and use of HSD fuel for transport.</p> <p>GHG mitigation plan:</p> <ul style="list-style-type: none"> - To reduce of pesticide and herbicide; program: no spraying on riparian area; target 2017: all block; timeline: January – December 2017; actual 2017 – no spraying in division I-VI. Program: to plant cover crop and beneficial plant on replanting area; target: all replanting blocks; timeline: April – August 2017; actual 2017 – 341,409 bags; Program: spraying tool calibration regularly; target 2017: once a year; timeline: June 2017; actual 2017 – 6 times in 2017 Program: spraying regime based on weed growth above 45%; target: conduct monitoring on weed growth on monthly base; timeline: January – December 2017; actual 2017 – weed control/spraying carried out 4 rounds with total application 19,839.67 Ha; - To reduce fossil fuel use; Program: transporation/fleet management; target reduce fuel use 2017:156,000 liters; timeline: January – December 2017; actual 2017 – use of fuel 2016 was 1.73 liters/MT FFB, use of fuel 2017 was 1.63 liters/MT FFB; Program: conduct checking and regular maintenance for all vehicle; target: regular vehicle check; timeline: January – December 2017; actual 2017 – all vehicle maintained. Program: Road maintenance; target: road maintenance as planned; timeline: January – December 2017; actual 2017 – road maintenance 595,710 meters (out of 207,600 meters) - To increase the efficiency in use of fertilizer; Program: Fertiliser application in line with fertilizer recommendation; target: for all oil palm block; target: January – October 2017; actual 2017 – fertilizer application as per recommendation; Program: to applied EFB on replanting area; target: for all replanting blocks; timeline: all year; actual 2017 – 43,066 MT for 973.90 Ha; 	<p>Comply</p>

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		<ul style="list-style-type: none"> - To reduce, reuse and recycle empty chemical container: Program: Collection and storage empty chemical container as hazardous waste; target: all hazardous waste to be place in temporary storage; timeline: January – December 2017; Program: appropriate handling on empty chemical container to be reuse and hand over hazardous waste into licensed operator; target: reuse empty chemical container for pre-mixing of chemical; timeline: January – December 2017; Program: utilization of empty fertilizer bag; target: using fertilizer bag for bridge construction and individual terrace; timeline: all year; Program: planting trees in HCV area, planting trees around worker housing, etc.; target 350 trees; timeline : January – December 2017; actual 2017 – a total of 230 trees were planted in conservation area and housing. 	
5.6.3	<p>A monitoring plan and results of regular reporting on emission and pollutants from estate and mill operations using appropriate methods, shall be available.</p> <ul style="list-style-type: none"> - Minor compliance – 	<p>Perlabian POM, Perlabian Estate, Tolan Estate: Calculation of GHG has been demonstrated. The data input submitted for calculation in palmGHG ver.3.0 has been verified and found to be in line with data produced on the field (Perlabian POM, Perlabian Estate and Tolan Estate).</p> <p>Result of GHG calculation is attached as part of public summary report <i>Appendix C – PalmGHG Calculation</i>.</p>	Comply
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers			
Criterion 6.1:			
Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	<p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>PT. Tolan Tiga Indonesia has the environmental document, as per “Dokumen Revisi Pengelolaan Lingkungan (RKL) for plantation area 8,479.06 Ha and POM with a capacity of 60 tons FFB/hour, in accordance with “Surat Persetujuan Kepala Badan Pengendalian Dampak Lingkungan Daerah No. 660/326/BPDLLB/Set/2006” dated 21 July 2006.</p> <p>The company also has conducted social impact assessment was conducted by “YASBI” in 2010. The process of preparing social impact assessment in March 2010 has actively involving stakeholders through guided interview, questionnaires and focus group discussion.</p>	Comply
6.1.2	<p>There shall be evidence that the assessment has been conducted with the participation of affected parties.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>Based on document verification, social impact assessment done by Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI) – demonstrates participation of communities through interview, focus group discussion and questionnaires and filling the questionnaire, it was also confirmed from the results of interviews with the surrounding villages, which states that the village government involved in data collection for social studies in 2010.</p>	Comply

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<p>6.1.3</p> <p>Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation.</p> <p>- Major compliance -</p>	<p>In each year the Company also conducts social data collection as part of the monitoring of social impacts.</p> <p>PT. Tolan Tiga Indonesia has established Impact Management and Monitoring Plan as outlined in the Matrix of Environmental Management and Monitoring EIA documents. The period for implementation of the management and monitoring including social impacts regulated in detail in the matrix. The evaluation and reporting period is done every six months, while for social impacts, monitoring and evaluation carried out annually</p> <p>Within the AMDAL and SIA document, the negative and positive impact of oil palm development has been explained. The environmental management and monitoring plan document has lined out effort that company should carry out in order to minimize negative impact and promote positive impact from oil palm development.</p> <p>The Social Impact Assessment document has explained the recommendation that could be done by company to minimize negative impact and promote positive impact from social impact management. Audit team also note, there was no recommendation for revision, since no significant activity, additional land clearing took place.</p>	<p>Comply</p>
<p>6.1.4</p> <p>The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties.</p> <p>- Minor compliance -</p>	<p>The Company has consistently monitoring the social impact each year, both from the aspect of social impact assessment results of the EIA and Social Studies in 2010. Data from the monitoring activity is used as a material evaluation of the implementation of social management every year and it is available in the Report of the RKL-RPL. The social impact of replanting activities and manufacturing boundary ditch has also been included in the monitoring of impact.</p> <p>Monitoring the social impact is done by involving the local community through a questionnaire, for example in 2017 conducted data collection questionnaire number of 40 respondents from the village community Tolan I/Tolan II, Perlabian, Gunung Selamat, Air Merah, Tanjung Selamat, Pekan Tolan, Perkebunan Perlabian dan Desa Meranti. These are the surrounding village to PT. Tolan Tiga Indonesia.</p> <p>In the Report of the Implementation and Monitoring of the Environment in 2017 also described the analysis of trends and plan efforts to reduce the negative impact.</p> <p>Audit team noted, there was no recommendation for revision, since no significant activity, additional land clearing took place.</p>	<p>Comply</p>
<p>6.1.5</p> <p>Particular attention shall be paid to the impacts of smallholder schemes</p>	<p>PT. Tolan Tiga Indonesia does not have scheme for smallholder.</p>	<p>N/A</p>

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(where the plantation includes such a scheme). - Minor compliance –		
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.		
6.2.1 Communication and consultation procedures shall be documented. - Major compliance -	Communication and consultation with stakeholder is regulated under: - Procedure for receiving and providing response upon information request "Prosedur Pemberian dan Tanggapan terhadap Permintaan Informasi" Dok.No.ENC/SOP/08 dated 6 April 2015. In the procedure regulates mechanism for providing and responding to information request, from stakeholder. - Procedure for internal complaint and grievance "Prosedur Keluh Kesah dengan Pihak Internal" Dok.No.SOP/025/Dept dated 27 March 2015. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart. Procedure for external complaint and grievance "Prosedur Keluh Kesah dengan Pihak Eksternal" Dok.No.SOP/026/HRA, dated 27 March 2015. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart.	Comply
6.2.2 The company shall have official(s) who is responsible for consultation and communications with parties. - Minor compliance -	As regulated under procedure No.ENC/SOP/08, stated the organization structure responsible to receive and provide response upon information request or internal and external complaint is Mill Manager fro Perlabian Mill, Estate Manager for Perlabian and Tolan Estate. During operation in Perlabian Estate, senior manager also appointed field head assistant and office assistant to help communicate with surrounding community.	Comply
6.2.3 The company shall have a list of stakeholders, records of communications, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders. - Minor compliance -	Company was able to show list of stakeholders, latest update on 25 January 2018, e.g: - Authorities of Labuhanbatu regency comprise of 7 offices: Regent office, Manpower office, Land office, Plantation services, Health office, Environmental Monitoring Body; - District level authorities: District head, police office, military office; - Surrounding villages, comprise of eight (8) villages for example: Desa Kebun Perlabian, Desa Tolan, Desa Perlabian, Desa Tanjung Selamat, Desa Tanjung Medan, Desa A3 Air Merah, Desa Tolan Pekan and Desa Gunung Selamat; - NGO/Pers; - Worker union of Serikat Pekerja Tolan Tiga Mandiri covering 5 committees; - Contractors, consist 6 contractors; - Supplier, consist 2 suppliers.	Comply

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	<p>Record of communication between company and stakeholder are available as follows:</p> <p>Stakeholder communication Perlabian POM recorded under:</p> <p>“Buku Rekaman Permintaan Informasi dan Tanggapan”, for type of information received in written. In 2018, there are 3 communications, e.g.:</p> <ul style="list-style-type: none"> - Letter No.B/35/III/18 on 7 March 2018 from Batalyon Infanteri 126/Kala Cakti regarding request of oil palm shell, has been approved by GM NS for 30 ton sof shell. - Letter No.421.5/023/HUB/PRAK/SMK-RP/I/2018 dated 18 January 2018 from SMK Swasta Pemda Rantau Prapat related request Perlabian POM as industrial practices, has been approved by Senior Mill Manager based on letter No. 02/PLM-02/2018 dated 3 February 2018. <p>“Buku Rekaman Keluh Kesah Internal & Ekternal”, for recording complaint from internal stakeholder and external stakeholders; In 2017 there are 39 types of internal complaints and no external complaints, e.g:</p> <ul style="list-style-type: none"> - On 19 September 2017 from Day worker, requesting for house repair; approved by Senior Mill Manager on 28 September 2017. - On 12 December 2017 from loading ramp operator requesting for house repair; approved by Senior Mill Manager on 19 December 2017. <p>Stakeholder communication for Tolan Estate recorded under “Buku Rekaman Permintaan Informasi dan Tanggapan”, for request of information received in written. In 2018 there were 7 types of communication, e.g: letter no. S.2.011/PKPLB3/A1/PLB.2/II/2017 on 9 January 2018 from “Direktorat Penilaian Kinerja Pengelolaan Limbah B3 dan Non B3” related to information for data input on “Siraja Limbah” application, has been followed up by Estate Manager on 10 January 2018; Letter from Vilage head of Desa Perkebunan Perlabian No. 400/050/PPL/II/2018 dated 28 February 2018 related request for permission of one of employee to attend “Monitoring Kecamatan Kampung Rakyat Perihal Anggaran Badan Usaha Milik Desa”, has been approved by Estate Manager on 2 March 2018.</p> <ul style="list-style-type: none"> - “Buku Rekaman Keluh Kesah Internal & Ekternal”, for recording complaint from internal and external stakeholders; In 2018 there are 8 communication from internal and none from external, for example; communication from kindergarten principal on 20 January 2018 regarding building damage on roof and swing, and bushes weeds, has been approved by Estate Manager and repair has been done on 22 Janaury 2018; communication from employee dated 15 March 2018 related request for repairing septic tank at 	

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	housing, has been approved by Estate Manager on 15 March 2018.	
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.		
6.3.1 The mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence. - Major compliance -	PT. Tolan Tiga Indonesia have a mechanism to resolve dispute, which consist of: Land dispute referring to land conflict resolution "Prosedur Ganti Rugi Lahan No.SOP/CA/02" dated 1 July 2012. The procedure demonstrates that company has provides effective land conflict resolution: <ul style="list-style-type: none"> - Company communicating the permit/HGU to community. - Should there be claim from community, company will receive the claim if complemented with evidence of land ownership. - Status verification of the said land, with involvement of company personnel, claimant/community and government representative. - Field visit and measurement to the claimed land. Minutes of land measurement then produced, with information on hectarage and coordinate points of claimed land, signed by all parties. - Final verification based on measurement result and map, to ensure the land is clean and clear, no overlapping with other ownership/other right and no claim from other party. - Should the final verification demonstrated that the land has no overlapping with other ownership/other right and no claim from other party – company will negotiate the price and carried out the compensation. - Once price agreed, based on negotiation, company will pay the claimant/land owners. Internal dispute/complaint resolution referring to "Mekanisme Keluh Kesah dengan Pihak Internal rev.II Doc.No.SOP/025/Dept" dated 27 March 2015. External dispute/complaint resolution referring to "Mekanisme Keluh Kesah dengan Pihak Eksternal rev.II Doc.No.SOP/026/HRA" dated 27 March 2015. Within these documents, company has indicated policy to protect anonymity of whistleblower, if requested.	Comply
6.3.2 There shall be records of process and outcome of dispute resolution. - Major compliance -	Based on document verification and/or stakeholder consultation with relevant authorities and surrounding villages, it was known that there was no land dispute between company and surrounding community. Internal and external complaint/dispute has been documented by company. See 6.2.3.	Comply
Criterion 6.4: 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.		

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<p>6.4.1 A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be available, referring to decision of the Constitution Court.</p> <p>- Major compliance –</p>	<p>As explained in criterion 2.2, PT. Tolan Tiga Indonesia has obtained the legal ownership of the land since long time ago. The legal ownership of the land granted by Republic of Indonesia through “Konversi Hak Barat/Erfpacht” right. Based on document review upon area statement PT. Tolan Tiga Indonesia shows no land under conflict status with other party.</p> <p>Up to ASA3_2, PT. Tolan Tiga Indonesia does not have new land clearing/expansion. However, company does have mechanism for land compensation, “Prosedur Ganti Rugi Lahan No.SOP/CA/02” dated 1 July 2012. The procedure comprise of compensation mechanism through communication, FPIC, document verification, evaluation upon land ownership document, participatory land measurement, price negotiation.</p> <p>The documentation for land compensation consist of measurement application document, minutes of land measurement, “Surat Keterangan Tanah”, “Surat Keterangan Tidak Sengketa” – statement letter no dispute, “Surat Pernyataan Pengakuan Hak” – statement letter on right acknowledgement, “Surat Pernyataan Ahli Waris” – statement letter for heir/next of kin, “Surat Pernyataan Lahan Pemilik Tanah/Lahan untuk Plasma” – Statement letter landowner/land for scheme smallholder (if any), “Surat Pelepasan Hak Menggarap atas Tanah Garapan” – statement letter on release of arable land, “Surat Ganti Rugi Tanah Garapan” – compensation letter.</p> <p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village, Perlabian village, “Desa Persiapan Losari” and interview with NGO Tim 10, there are no report from local community on land conflict between company and community.</p> <p>Based on consultation with local governments Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.</p>	<p>Comply</p>
<p>6.4.2 A procedure for calculating and distributing fair compensation shall be established, implemented, monitored and evaluated in a participatory way. Corrective actions are taken as a result of this evaluation.</p> <p>- Minor compliance –</p>	<p>As explained in criterion 2.2, PT. Tolan Tiga Indonesia has obtained the legal ownership of the land since long time ago. The legal ownership of the land granted by Republic of Indonesia through “Konversi Hak Barat/Erfpacht” right. Based on document review upon area statement PT. Tolan Tiga Indonesia shows no land under conflict status with other party.</p> <p>Up to ASA3_2, PT. Tolan Tiga Indonesia does not have new land clearing/expansion. However, company does have mechanism for land compensation, “Prosedur Ganti Rugi Lahan No.SOP/CA/02” dated 1 July 2012. The procedure comprise of compensation mechanism through communication, FPIC, document verification, evaluation upon land ownership document,</p>	<p>Comply</p>

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	<p>participatory land measurement, price negotiation. The documentation for land compensation consist of measurement application document, minutes of land measurement, "Surat Keterangan Tanah", "Surat Keterangan Tidak Sengketa" – statement letter no dispute, "Surat Pernyataan Pengakuan Hak" – statement letter on right acknowledgement, "Surat Pernyataan Ahli Waris" – statement letter for heir/next of kin, "Surat Pernyataan Lahan Pemilik Tanah/Lahan untuk Plasma" – Statement letter landowner/land for scheme smallholder (if any), "Surat Pelepasan Hak Menggarap atas Tanah Garapan" – statement letter on release of arable land, "Surat Ganti Rugi Tanah Garapan" – compensation letter.</p> <p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village, Perlabian village, "Desa Persiapan Losari" and interview with NGO Tim 10, there are no report from local community on land conflict between company and community.</p> <p>Based on consultation with local governments Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.</p>	
<p>6.4.3 Compensation claims, process and outcome of any negotiated agreements shall be documented, with evidence of the participation of affected parties. - Major compliance –</p>	<p>As explained in criterion 2.2, PT. Tolan Tiga Indonesia has obtained the legal ownership of the land since long time ago. The legal ownership of the land granted by Republic of Indonesia through "Konversi Hak Barat/Erfpacht" right. Based on document review upon area statement PT. Tolan Tiga Indonesia shows no land under conflict status with other party.</p> <p>Up to ASA3_2, PT. Tolan Tiga Indonesia does not have new land clearing/expansion. However, company does have mechanism for land compensation, "Prosedur Ganti Rugi Lahan No.SOP/CA/02" dated 1 July 2012. The procedure comprise of compensation mechanism through communication, FPIC, document verification, evaluation upon land ownership document, participatory land measurement, price negotiation.</p> <p>The documentation for land compensation consist of measurement application document, minutes of land measurement, "Surat Keterangan Tanah", "Surat Keterangan Tidak Sengketa" – statement letter no dispute, "Surat Pernyataan Pengakuan Hak" – statement letter on right acknowledgement, "Surat Pernyataan Ahli Waris" – statement letter for heir/next of kin, "Surat Pernyataan Lahan Pemilik Tanah/Lahan untuk Plasma" – Statement letter landowner/land for scheme smallholder (if any), "Surat Pelepasan Hak Menggarap atas Tanah Garapan" – statement letter on release of arable land, "Surat Ganti Rugi Tanah Garapan" – compensation letter.</p>	<p>Comply</p>

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	<p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village, Perlabian village, "Desa Persiapan Losari" and interview with NGO Tim 10, there are no report from local community on land conflict between company and community.</p> <p>Based on consultation with local governments Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.</p>	
<p>Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</p>		
<p>6.5.1</p> <p>Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.</p> <p>- Major compliance -</p>	<p>Collective work agreement – "Perjanjian Kerja Bersama" has regulated the salary payment. As stated "Pekerja Harian Tetap dan Pekerja Bulanan Tetap diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama antara manajemen dengan SPTTM sesuai dengan undang-undang dan peraturan yang berlaku dengan mengingat situasi ekonomi dan kemampuan perusahaan" – daily worker and monthly worker paid in cash, based on common agreement determined between management and worker union, in accordance to relevant regulations, considering economic situation and company's ability.</p> <p>The minimum payment year 2018 has been issued through "Surat Keputusan Gubernur Sumatera Utara No.188.44/10/Kpts/2018 tentang Upah Minimum Sektoral Kabupaten Labuhan Batu Selatan tahun 2018". The regulation states the minimum payment for Labuhan Batu Selatan regency year 2018 was sets at Rp.2,750,000/month. Further, company have sets the rate for worker through "Memorandum HRAD No.15/HRAD-CIR/III/2018 tentang Upah Pekerja Harian Tetap dan Pekerja Bulanan Tetap tahun 2018" dated 5 March 2018. The rate sets for "Pekerja Harian Tetap":</p> <ul style="list-style-type: none"> - 0 – 3 years at Rp. 2,568,000/month; - 3 years and 1 month – 6 years at Rp. 2,570,000/month; - 6 years and 1 month - up at Rp. 2,572,000/month. <p>"Pekerja Harian Bulanan" with the lowest grade (P1) at Rp. 2,710,000/month.</p> <p>This has not included the benefit "tunjangan natura" which refers to "Badan Kerjasama-Perusahaan Perkebunan di Sumatera (BKS-PPS). The worker entitled to fixed benefit of 15 kg rice; the dependent (wife) entitled to 9 kg rice; the dependent (children) entitled to 7.5 kg rice. The value of the rice have referred to specified by BKS-PPS:</p> <ul style="list-style-type: none"> - Value for rice in February 2018 sets at Rp.9,200/kg as per "Surat BKS-PPS No.02/SE-K/BKS/2018" dated 7 February 2018. 	<p>Comply</p>

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	<ul style="list-style-type: none"> - Value for rice in March 2018 sets at Rp.9,200/kg as per "Surat BKS-PPS No.03/SE-K/BKS/2018" dated 6 March 2018. <p>In addition, company have stipulated the rate for temporary worker, as regulated in "Memorandum GMO Sumut No.11/GMO-All Estate/III/2018 tentang Upah PKWT 2018" dated 16 March 2018. The memorandum sets Rp. 2,750,000/month or Rp. 110,000/manday.</p> <p>Based on document verification, interview with worker union committee stated that at the time of audit using standard for salary 2017. During the interview, worker union committee stated the salary for year 2018 will be discussed between worker union and company on March 2018 in Medan. There was a commitment that the salary for year 2017 would applies retrospective since January 2018. This means the difference of payment between salary 2018 and salary 2017, will be topped up once the salary increment agreed by both parties. The same regime verified to be applied consistently during pay rate transition in 2016 to 2017.</p> <p>Based on document verification, salary payment for month December 2017 - January 2018 was using 2017 standard. A number of worker salary payment sampled:</p> <p>Perlabian Estate:</p> <ul style="list-style-type: none"> - Mrs. A*** P**** S****, SKU-B PLE on December 2017 receives Rp.3,561,721; consist of basic salary Rp.2,512,000; rice benefit Rp.299,250; BPJS Ketenagakerjaan benefit Rp.120,243; BPJS Kesehatan benefit Rp.100,480; BPJS Pensiun benefit Rp.52,970; Overtime Rp.459,278 and Electrical benefit Rp. 17,500. - Mr. A***** Z*****, PKWT PLE on February 2018 receives Rp.2,663,500; consist of basic salary Rp. 2,500,000; BPJS Ketenagakerjaan benefit Rp. 113,500; BPJS Pensiun benefit Rp.50,000. Note that the difference topped up by the end of March 2018. - Mr. S**** A*****, SKU-H PLE on February 2018 receives Rp.2,872,139; consist of basic salary Rp.2,373,000; rice benefit Rp.240,000; BPJS Ketenagakerjaan benefit Rp.113,999; BPJS Kesehatan benefit Rp.94,920; BPJS Pensiun benefit Rp.50,220. - Mrs. K***** S***** H*****, SKU-B PLPOM on January 2018 receives Rp.5,189,510; consist of basic salary Rp.2,373,000; rice benefit Rp.150,000; BPJS Ketenagakerjaan benefit Rp.113,999; BPJS Kesehatan benefit Rp.94,920; BPJS Pensiun benefit Rp.50,220; Premi Rp.117,309; Overtime Rp.2,264,184; Tax Benefit Rp. 8,378; and Electrical benefit Rp.17,500. - Mr. Steven Putra Apriano M., PKWT PLPOM on 	

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	<p>January 2018 receives Rp.4,758,327; consist of basic salary Rp.2,500,000; BPJS Ketenagakerjaan benefit Rp.113,500; BPJS Kesehatan benefit Rp.100,000; Overtime Rp.2,044,827.</p> <ul style="list-style-type: none"> - Mr. B**** A***** A*****, PKWT PLPOM on February 2018 receives Rp.4,534,337; consist of basic salary Rp.2,500,000; BPJS Ketenagakerjaan benefit Rp.113,500; BPJS Kesehatan benefit Rp.100,000; Overtime Rp.1,820,837. <p>Temporary worker was hired through cooperative service, "Koperasi Jasa Karyawan PT Tolan Tiga Indonesia", in accordance to work agreement and in accordance to regulation, whereby the determination of daily salary referring to minimum salary year 2018 divided into 25 working days. While payment for piece-rate work calculated based on daily salary divided with average productivity per day. For piece rate pay, company have calculated the ability of average worker for particular task, in accordance ti the classification. This have been stipulated under "Labour Material Standard (Field Rates) Budget 2018". For example on field with mature oil palm-mineral soil, the standard piece-rate:</p> <ul style="list-style-type: none"> - Loose Fruit Collection value Rp.260/Kg. - Creeper Weeding value Rp.65,000/Ha. - Upkeep Collection Road value Rp.1,700/meter. - Sensus Pest and Disease value Rp.8,380/Ha. - Weeding Cover Crop value Rp.100,000/Ha. 	
<p>6.5.2 Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>Collective work agreement – "Perjanjian Kerja Bersama" which signed by worker union and management of PT. Tolan Tiga Indonesia has been registered with "Dinas Tenaga Kerja Propinsi Sumatera Utara". The collective work agreement has been acknowledged through "Surat Keputusan Kepala Dinas Tenaga dan Transmigrasi Propinsi Sumatera Utara No.27-6/DTK-TR/2017" dated 25 January 2017, and valid for two (2) years up to 8 January 2019. Inside the collective work agreement has regulated</p> <ul style="list-style-type: none"> - Salary payment: salary in form of cash based on agreement and in accordance to relevant laws and regulation; salary in form of rice benefit, 15 kg for worker, 9 kg for wife/spouse and 7.5 kg for each children (up to maximum 3 children). - Working time regulates the number of working hour per week, change and replacement of working time, weekly rest day, national holidays, working time for female worker. - Chapter X regulates working overtime – in accordance with "Keputusan Menteri Tenaga Kerja No.Kep-102/Men/VI2014". - Religious day and bonus also regulated. <p>Based on document verification upon sampled work agreement shows the right and obligation including salary and benefit refers to relevant laws and regulations.</p>	<p>Comply</p>
<p>6.5.3 Growers and millers shall provide</p>	<p>From document review and field visit to worker's</p>	<p>Comply</p>

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	<p>adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.</p> <ul style="list-style-type: none"> - Minor compliance – 	
<p>6.5.4</p>	<p>There shall be demonstrable efforts to improve workers’ access to adequate, sufficient and affordable food.</p> <ul style="list-style-type: none"> - Minor compliance – 	<p>Comply</p>
<p>Criterion 6.6: The employer 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>		
<p>6.6.1</p>	<p>A record of the company’s policy in understandable language recognising freedom of association, shall be available.</p> <ul style="list-style-type: none"> - Major compliance – 	<p>Comply</p>

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	<p>Estate dated 15 March 2018 and attended 111 workers.</p> <ul style="list-style-type: none"> - "Sosialisasi Kebijakan Kebebasan Berserikat" during morning Muster Chit Field Work Processing A, Perlabian POM dated 16 January 2018 and attended 30 workers. <p>The communication of freedom of association also conducted by installing the copy of policy in Perlabian POM, Perlabian Estate and Tolan Estate.</p>	
<p>6.6.2 Records of meetings with labor unions or workers representatives shall be available.</p> <ul style="list-style-type: none"> - Minor compliance – 	<p>Meeting with the company and labour union was conducted regularly, on monthly basis. Several meetings were held, in conjunction with bi-partite meeting, e.g.:</p> <ul style="list-style-type: none"> - Meeting titled "Pertemuan antara Manajemen PT Tolan Tiga Indonesia dengan Serikat Pekerja" dated 28 February – 2 March 2018 related to slaary increment 2018. Minutes of meeting signed by both parties. - Meeting titled "Rapat Bipartit antara Manajemen PLPOM dengan Serikat Pekerja Unit PLPOM dengan agenda kenaikan upah PKWT, Hariin Tetap dan pekerja bulanan tetap tahun 2018 dan pembayaran surut upah dan lembur untuk periode Januari - Februari 2018" dated 5 March 2018. The meeting discussing salary increment for temporary worker, permanent worker and the payment for topping up payment month January – February 2018 (transition period between 2017 and 2018 minimum wage). Meeting attended by 10 member of the bipartite. Minutes of meeting signed by both parties. - Meeting titled "Rapat Bipartit antara Manajemen PLPOM dengan Serikat Pekerja Unit PLPOM agenda usulan kegiatan olahraga bagi karyawan/i yang diadakan diluar jam dinas" dated 27 January 2018. The agenda discussing request from worker to company, so that company help to provide sport events. Meeting attended by 10 member of the bipartite. Minutes of meeting signed by both parties. - Meeting titled "Rapat Bipartit antara Manajemen PLPOM dengan Serikat Pekerja Unit PLPOM tentang peringatan hari kemerdekaan 17 Agustus 2017" dated 27 July 2017; related to preparation for incoming independence day. Meeting attended by 8 member of the bipartite. Minutes of meeting signed by both parties. 	<p>Comply</p>
<p>Criterion 6.7: Children are not employed or exploited.</p>		
<p>6.7.1 There shall be documented evidence that minimum age requirements are met.</p> <ul style="list-style-type: none"> - Major compliance – 	<p>The company has policy related minimum ages, under "Kebijakan Pekerja Anak" signed by President Director dated 1 March 2014 that stated "PT. Tolan Tiga Indonesia believe that children should have the right to education and a healthy life, and is committed to ensuring that children, under the age of 18 years, are</p>	<p>Comply</p>

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	<p>not employed by the company for any work related purpose”.</p> <p>Based on document review upon Perlabian POM list of workers dated 1 March 2018 shows no wokers under 18 years old. The youngest worker in Perlabian POM is Mr.B**** A***** ART, warehouse clerk (22 years, 11 month) and Fitri Ardiyan, loading ramp (23 years).</p> <p>Based on document review upon Perlabian Estate list of workers dated 1 March 2018 shows no wokers under 18 years old. The youngest worker in Perlabian Estate is Diki Pratama Putra (19 years, 11 month).</p> <p>Based on document review upon Tolan Estate list of workers dated 1 March 2018 shows no wokers under 18 years old. The youngest worker in Tolan Estate is Fredi Roy Sanjaya (21 years, 5 month) and Yopi Kurniawan (21 years, 7 month).</p> <p>This policy has also been communicated to “Koperasi Jasa Karyawan Tolan Tiga” whereby act as outsourcing service provider for daily worker. Based on interview and verification, there was no worker under 18 years old accepted for work.</p> <p>Communication to workforce was through installing policy on estate and mill’s notice board, as well as communicating directly. For example: communication on 14 January 2018 to Perlabian POM workers, attended by 30 workers from processing, 18 worker from laboratory, office and driver, 18 worker from workshop.</p> <p>The policy has been disseminated to all employees through the installation of related policies on the notice board, in the Perlabian and Tolan Estate offices and dissemination directly to the employees, for example: on 20 March 2018, in Division I attended by 45 workers; in Division II attended by 33 workers; in Division III attended 37 manuring workers and 32 harvester; in Division IV attended by 38 workers; in Division V attended by 35 workers.</p>	
<p>Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p>		
<p>6.8.1 A company’s policy on equal opportunity and treatment for work shall be available and documented. - Major compliance –</p>	<p>The company has policy for equal opportunities, under “Kebijakan Persamaan Kesempatan Kerja”, which stated that “The company is not discriminating against anyone in the recruitment practice or in the performance of the company business operation” dated 1 March 2014, signed by President Director.</p> <p>PT. Tolan Tiga Indonesia have communicating the policy on equal treatment and anti-discrimination; through posters on announcement boards and direct dissemination.</p> <p>- “Sosialisasi Kebijakan Persamaan Kesempatan</p>	<p>Comply</p>

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	<p>Bekerja” – equal opportunity disseminated during Muster Chit Field Work Division II, Perlabian Estate dated 12 March 2018 and attended by 117 workers.</p> <p>- “Sosialisasi Kebijakan Persamaan Kesempatan Bekerja” – equal opportunity disseminated during Muster Chit Field Work Processing B, Perlabian POM dated 16 January 2018 and attended by 28 workers.</p>	
<p>6.8.2</p> <p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated.</p> <p>- Major compliance –</p>	<p>Based on verification upon list of workers in Perlabian POM, Tolan Estate and Perlabian Estate, there was no indication of worker discrimination related to gender, race, religion or tribe.</p> <p>Based on interview with worker union committee, “Serikat Pekerja Tolan Tiga Mandiri” and interview with workers (sprayers, fertilizer applicator and harvesters) company does not discriminate any of the workers.</p>	<p>Comply</p>
<p>6.8.3</p> <p>Records of evidence that equal opportunity and treatment for work shall be available.</p> <p>– Minor compliance -</p>	<p>Company has an equal employment opportunity policy, signed by President Director on 1 March 2014. The policy stated company will not discriminate anyone during recruitment, hiring or other business; Selection to fill in position based on qualification and experience. Violation against policy results in disciplinary action and could be legal action.</p> <p>Company has human resources system, with clear organization structure, job description, incentive system, bonus system, training plan and implementation, provision of human resources in line with required qualification. Company has procedure for hiring workers, dated 25 April 2007. The procedure regulated that hiring and promotion of workers based on skill, work experiences, interview/evaluation, and medical check up result. This has also regulated inside the collective work agreement.</p> <p>Based on verification against employment document and interview with worker union “Serikat Pekerja Tolan Tiga Mandiri”, it is known that recruitment, hiring and promotion are based on test, considering the job type. Promotion done through yearly worker evaluation. As example; “Form Penilaian Karyawan SKU” consists of 10 evaluation parameters done by Evaluator (FA/TA/OA) and verified by Estate Manager.</p> <p>Working tools for workers are provided by company, as regulated by “Perjanjian Kerja Bersama/PKB”. The provision of wheelbarrow was paid half by worker and half by company. Provision of other working tools for other upkeep/general work is provided by cooperative.</p>	<p>Comply</p>
<p>Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.</p>		
<p>6.9.1</p> <p>A policy to prevent sexual and all other forms of harassment and violence, shall be documented,</p>	<p>PT. Tolan Tiga Indonesia has a policy to prevent sexual harassment under “Kebijakan Pelecehan Seksual”, signed by President director on 1 March</p>	<p>Comply</p>

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<p>implemented and communicated to all levels of the workforce. - Major compliance –</p>	<p>2014. The policy stated: Company uphold the laws under Republic of Indonesia related to sexual harassment; sexual harassment could occurs in form of physical contact, comments, jokes, exhibition or other behavior; All discrimination and sexual harassment complaint will be handle in good manner and confidential to achieve fair statement and reduce false accusation. There shall be no false sexual harassment accusation. Sexual harassment applies equally – both men and women. Sexual harassment accusation with solid evidence could lead to disciplinary action including termination. False report on sexual harassment, without evidence could also lead to disciplinary action including termination and legal action.</p> <p>Communication to workforce was through installing policy on estate and mill's notice board, as well as communicating directly. For example: communication on 14 January 2018 to Perlabian POM workers, attended by 30 workers from processing, 18 worker from laboratory, office and driver, 18 worker from workshop.</p> <p>The policy has been disseminated to all employees through the installation of related policies on the notice board, in the Perlabian and Tolan Estate offices and dissemination directly to the employees, for example: on 20 March 2018, in Division I attended by 45 workers; in Division II attended by 33 workers; in Division III attended 37 manuring workers and 32 harvester; in Division IV attended by 38 workers; in Division V attended by 35 workers.</p> <p>PT. Tolan Tiga Indonesia have established gender committee to solve sexual harassment cases and enhance reproductive right for women workers. Organization Structure of Gender committee has been updated on 18 February 2016. Gender Committee conducts meeting Regularly as evident in minute of meeting and attendance list, e.g. Meeting on 10 March 2018, in Perlabian POM, attended by 40 workers; meeting on 15 February 2018 in Tolan Estate.</p> <p>No sexual harassment and violating of reproductive rights were noted during audit and interview with workers and gender committee leader and members. Until this surveillance period, there has no sexual harassment complaint received by the gender committee.</p>		
<p>6.9.2</p>	<p>A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce. - Major compliance –</p>	<p>Company has a policy related to protection of reproductive rights, under "Kebijakan Perlindungan Hak-hak Reproduksi", was signed by President Dorector on 1 March 2014. The policy covers provision of counseling related to sexuality, pregnancy, contraception aid, infertility, infection and</p>	<p>Comply</p>

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	<p>sexually-transmitted-disease; sex education and gender; prevention and medication on reproductive infection including HIV/AIDS; Provision of pregnancy, delivery and ante-natal treatment; Baby and infant health service; Encourage male participation in sharing responsibility related to sexual behavior, during maternal period, HIV/AIDS and domestic violence.</p> <p>Pregnancy check employee performed once every month, the record seen in Perlabian Estate: Attendance list female sprayer – not pregnant and not breast-feeding - “Daftar Absensi Tenaga Kerja Wanita Tidak Hamil dan Menyusui” February 2018 – No pregnant.</p> <p>Based on interview with gender committee, company has understood the implementation of protection on reproductive rights in form of menstruation leave issue, maternal leave, medical checkup for female worker, performing jobs related to agrochemical and prevention of domestic violence.</p> <p>Communication to workforce was through installing policy on estate and mill’s notice board, as well as communicating directly. For example: communication on 14 January 2018 to Perlabian POM workers, attended by 30 workers from processing, 18 worker from laboratory, office and driver, 18 worker from workshop.</p> <p>The policy has been disseminated to all employees through the installation of related policies on the notice board, in the Perlabian and Tolan Estate offices and dissemination directly to the employees, for example: on 20 March 2018, in Division I attended by 45 workers; in Division II attended by 33 workers; in Division III attended 37 manuring workers and 32 harvester; in Division IV attended by 38 workers; in Division V attended by 35 workers.</p>	
<p>6.9.3</p>	<p>A specific grievance mechanism which respects anonymity of complainants where requested, and as long as they are supported with adequate information, shall be documented, implemented, and communicated to all workforce. - Minor compliance –</p>	<p>Comply</p>

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	<p>confidential manner to help achieve fair hearing of the reports. No employee is to be victimized for reporting sexual harassment. The policy also guarantees anonymity and confidentiality of reporter.</p> <p>Based on interview with female workers in Perlabian POM, Perlabian and Tolan Estate (sprayers and manuring workers), shows understanding of mechanism to report on sexual harassment/domestic violence or other gender-related issues. Based on notulen of Gender Committee meeting there is no form of sexual harassment occurred in Perlabian POM, Perlabian and Tolan Estate.</p>	
<p>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>		
<p>6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB), shall be publicly available. - Minor compliance -</p>	<p>Perlabian POM does not received and/or process FFB from third-party sources. Perlabian POM was receiving FFB only from certified source, Perlabian Estate and Tolan Estate. This indicator was not applicable for Perlabian POM.</p>	<p>Not Applicable N/A</p>
<p>6.10.2 Pricing mechanisms for Fresh Fruit Bunches (FFB) and inputs/services shall be explained and documented (where these are under the control of the mill or plantation). - Major compliance -</p>	<p>Perlabian POM does not received and/or process FFB from third-party sources. Perlabian POM was receiving FFB only from certified source, Perlabian Estate and Tolan Estate. This indicator was not applicable for Perlabian POM.</p>	<p>Not Applicable N/A</p>
<p>6.10.3 Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -</p>	<p>The company was using service from cooperative, "Koperasi Jasa Karyawan PT. Tolan Tiga Indonesia" for the provision of temporary worker. Based on interview with the contractor worker/temporary worker and cooperative committee, they have contractual agreement with PT. Tolan Tiga Indonesia. The agreement, "Surat Perjanjian Kerja antara PT. Tolan Tiga Indonesia dan Koperasi Jasa Karyawan PT. Tolan Tiga Indonesia No.01/TTI/KJK/I/2018", dated 2 January 2018 has been signed by both parties. The work agreement covers the scope of work, i.e. field upkeep work for Tolan Estate, Perlabian Estate and Perlabian POM; regulates the provision of social insurance "BPJS Ketenagakerjaan dan BPJS Kesehatan" by cooperative to its worker; Provision of minimum wage by cooperative; monitoring on the use of PPE; and prohibition on worker under 18 years old. The agreement was available in Bahasa Indonesia and has been understood by worker and the cooperative committee.</p>	<p>Comply</p>
<p>6.10.4 Agreed payments shall be made in a timely manner. - Minor compliance -</p>	<p>From documented evidence, the payment of contractor/cooperative was made on time. In accordance to the time-frame regulated in the contract. Furthermore, based on interviews with the management of cooperatives and temporary employees stated that PT. Tolan Tiga Indonesia has paid the cooperative in accordance with the employment agreement in the Employment Agreement.</p>	<p>Comply</p>

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Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Records of contributions to local development based on the results of consultation with local communities shall be available. - Minor compliance -	Perlabian Estate and Tolan Estate in 2017 and 2018, there are 8 types Program Community Development, e.g. in Education, Infrastructure, Agriculture, entrepreneurship, sports, arts, religious and social-economics. Record of implementation the program of CSR documented by company, e.g: Renovation of education building "Pondok Pesantren Ridho Amal, Desa Perlabian" on September 2017; Renovation of elementary school "SDN Desa Tanjung Selamat" on December 2017; Renovation and maintenance of water drainage in "Desa Perlabian" on December 2017; Provision of sport equipment to "Dusun Air Serdang, Desa Air Merah" on September 2017; Provision of building material to renovate elementary school building "SDN 115523 Desa Meranti"; Provision of waste bin for "Desa Pekan Tolan".	Comply
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve scheme smallholder productivity. - Minor compliance -	No smallholder scheme in PT. Tolan Tiga Indonesia. Not applicable.	Not Applicable N/A
Criterion 6.12: No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labor are used. - Major compliance -	The company has had a policy against Forced Labour or Labour traded (Company Policy or trafficked Against Forced Labour) adopted by President Director dated 1 March 2014, that is: <ul style="list-style-type: none"> - The Company does not use forced labor or trafficked workers either directly or through a third party. - The Company acknowledged that slave labor or trafficked labor can take many forms, all of which are equally unacceptable. Debt bondage or bonded labor employment relationship because the debt is considered forced labor. - The alleged use of forced labor or labor which are traded by the company's employees if proven would result in disciplinary action up to termination of employment and also can result in legal action. - Companies that do business with PT. Tolan Tiga Indonesia required adhering to this policy. Violation of this policy if proven would result in disciplinary action up to termination of employment and also can result in legal action. This policy applies to PT. Tolan Tiga Indonesia and for the entire company under the management of PT. Tolan Tiga. The policy has been disseminated to stakeholders through the installation of such policies on the notice	Comply

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Criterion / Indicator	Assessment Findings	Compliance
	<p>board, in their respective Estate offices and dissemination directly to the employees, for example:</p> <ul style="list-style-type: none"> - "Sosialisasi Kebijakan Larangan Kerja Paksa dan Perdagangan Buruh" – policy to prohibit forced labour and labour trafficking disseminated during Muster Chit Field Work Division II, Perlabian Estate dated 12 March 2018 and attended by 117 workers. - "Sosialisasi Kebijakan Larangan Kerja Paksa dan Perdagangan Buruh" – policy to prohibit forced labour and labour trafficking disseminated during Muster Chit Field Work Processing A, Perlabian POM dated 16 January 2018 and attended by 30 workers. 	
<p>6.12.2</p>	<p>It shall be demonstrated that no contract substitution has occurred.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Comply</p>
<p>6.12.3</p>	<p>Where migrant/foreign/honorary workers are employed, a special worker policy and procedures and the evidence of implementation shall be available.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>Comply</p>
<p>Criterion 6.13: Growers and millers respect human rights.</p>		
<p>6.13.1</p>	<p>A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>Comply</p>

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	<p>communication on 14 January 2018 to Perlabian POM workers, attended by 30 workers from processing, 18 worker from laboratory, office and driver, 18 worker from workshop.</p> <p>The policy has also been disseminated to all employees through the installation of related policies on the notice board, in the Perlabian and Tolan Estate offices and dissemination directly to the employees, for example: on 20 March 2018, in Division I attended by 45 workers; in Division II attended by 33 workers; in Division III attended 37 manuring workers and 32 harvester; in Division IV attended by 38 workers; in Division V attended by 35 workers.</p> <p>Based on interview with worker representatives, they all understood policy related respect human right.</p>																																								
<p>Principle 7: Responsible development of new plantings</p>																																									
<p>Criterion 7.1:</p>																																									
<p>A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.</p>																																									
<p>7.1.1</p>	<p>An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>There was no new planting after November 2005. The criterion 7.1 was not applicable.</p> <p>In Tolan Estate, from old maps and documentation, it was found that the oil palm:</p> <ul style="list-style-type: none"> - Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980; - Oil palm planted in 2008 was originated from oil palm planted in 1980; - Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982; - Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982; - Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982; <p>Replanting Plan Tolan Estate:</p> <table border="1" data-bbox="715 1480 1273 1621"> <thead> <tr> <th>Replanting year</th> <th>Division/Initial Planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>Div.II: 1994</td> <td>173.33 Ha</td> </tr> <tr> <td rowspan="2">2022</td> <td>Div.II: 1994</td> <td>72.58 Ha</td> </tr> <tr> <td>Div.III: 1994</td> <td>95.03 Ha</td> </tr> </tbody> </table> <p>It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.</p> <p>Perlabian Estate:</p> <table border="1" data-bbox="715 1733 1230 2004"> <thead> <tr> <th>Replanting year</th> <th>Division/Planting year</th> <th>Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1992, 1996</td> <td>202.75</td> </tr> <tr> <td>2019</td> <td>1992, 1993, 1996</td> <td>195.93</td> </tr> <tr> <td>2020</td> <td>1993, 1996</td> <td>165.77</td> </tr> <tr> <td>2021</td> <td>1992, 1994, 1996</td> <td>178.60</td> </tr> <tr> <td>2022</td> <td>1993, 1995</td> <td>220.71</td> </tr> <tr> <td>2023</td> <td>1995</td> <td>190.52</td> </tr> <tr> <td>2024-2027</td> <td>Planting holiday</td> <td>0</td> </tr> <tr> <td>2028</td> <td>2003</td> <td>168.39</td> </tr> </tbody> </table>	Replanting year	Division/Initial Planting year	Hectarage	2021	Div.II: 1994	173.33 Ha	2022	Div.II: 1994	72.58 Ha	Div.III: 1994	95.03 Ha	Replanting year	Division/Planting year	Hectarage (Ha)	2018	1992, 1996	202.75	2019	1992, 1993, 1996	195.93	2020	1993, 1996	165.77	2021	1992, 1994, 1996	178.60	2022	1993, 1995	220.71	2023	1995	190.52	2024-2027	Planting holiday	0	2028	2003	168.39	<p>Not Applicable N/A</p>
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<p>7.1.2</p>	<p>Appropriate management planning</p>	<p>See Criterion 7.1.1</p>	<p>Not</p>																																						

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	and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts. - Minor compliance -	applicable N/A																																							
7.1.3	Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention. - Minor compliance -	See Criterion 7.1.1 Not applicable N/A																																							
Criterion 7.2: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																																									
7.2.1	Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations. - Major compliance -	There was no new planting after November 2005. The criterion 7.2 was not applicable. In Tolan Estate, from old maps and documentation, it was found that the oil palm: <ul style="list-style-type: none"> - Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980; - Oil palm planted in 2008 was originated from oil palm planted in 1980; - Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982; - Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982; - Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982; Replanting Plan Tolan Estate: <table border="1" data-bbox="715 1279 1273 1413"> <thead> <tr> <th>Replanting year</th> <th>Division/Initial Planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>Div.II: 1994</td> <td>173.33 Ha</td> </tr> <tr> <td rowspan="2">2022</td> <td>Div.II: 1994</td> <td>72.58 Ha</td> </tr> <tr> <td>Div.III: 1994</td> <td>95.03 Ha</td> </tr> </tbody> </table> It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994. Perlarian Estate: <table border="1" data-bbox="715 1532 1230 1803"> <thead> <tr> <th>Replanting year</th> <th>Division/Planting year</th> <th>Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1992, 1996</td> <td>202.75</td> </tr> <tr> <td>2019</td> <td>1992, 1993, 1996</td> <td>195.93</td> </tr> <tr> <td>2020</td> <td>1993, 1996</td> <td>165.77</td> </tr> <tr> <td>2021</td> <td>1992, 1994, 1996</td> <td>178.60</td> </tr> <tr> <td>2022</td> <td>1993, 1995</td> <td>220.71</td> </tr> <tr> <td>2023</td> <td>1995</td> <td>190.52</td> </tr> <tr> <td>2024-2027</td> <td>Planting holiday</td> <td>0</td> </tr> <tr> <td>2028</td> <td>2003</td> <td>168.39</td> </tr> </tbody> </table>	Replanting year	Division/Initial Planting year	Hectarage	2021	Div.II: 1994	173.33 Ha	2022	Div.II: 1994	72.58 Ha	Div.III: 1994	95.03 Ha	Replanting year	Division/Planting year	Hectarage (Ha)	2018	1992, 1996	202.75	2019	1992, 1993, 1996	195.93	2020	1993, 1996	165.77	2021	1992, 1994, 1996	178.60	2022	1993, 1995	220.71	2023	1995	190.52	2024-2027	Planting holiday	0	2028	2003	168.39	Not applicable N/A
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7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations. - Minor compliance -	See Criterion 7.2.1 Not applicable N/A																																							

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Criterion 7.3: New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.																																									
7.3.1	<p>There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).</p> <p>- Major compliance –</p>	<p>There was no new planting after November 2005. The criterion 7.3 was not applicable.</p> <p>In Tolan Estate, from old maps and documentation, it was found that the oil palm:</p> <ul style="list-style-type: none"> - Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980; - Oil palm planted in 2008 was originated from oil palm planted in 1980; - Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982; - Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982; - Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982; <p>Replanting Plan Tolan Estate:</p> <table border="1" data-bbox="715 954 1273 1088"> <thead> <tr> <th>Replanting year</th> <th>Division/Initial Planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>Div.II: 1994</td> <td>173.33 Ha</td> </tr> <tr> <td rowspan="2">2022</td> <td>Div.II: 1994</td> <td>72.58 Ha</td> </tr> <tr> <td>Div.III: 1994</td> <td>95.03 Ha</td> </tr> </tbody> </table> <p>It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.</p> <p>Perlabian Estate:</p> <table border="1" data-bbox="715 1205 1230 1473"> <thead> <tr> <th>Replanting year</th> <th>Division/Planting year</th> <th>Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1992, 1996</td> <td>202.75</td> </tr> <tr> <td>2019</td> <td>1992, 1993, 1996</td> <td>195.93</td> </tr> <tr> <td>2020</td> <td>1993, 1996</td> <td>165.77</td> </tr> <tr> <td>2021</td> <td>1992, 1994, 1996</td> <td>178.60</td> </tr> <tr> <td>2022</td> <td>1993, 1995</td> <td>220.71</td> </tr> <tr> <td>2023</td> <td>1995</td> <td>190.52</td> </tr> <tr> <td>2024-2027</td> <td>Planting holiday</td> <td>0</td> </tr> <tr> <td>2028</td> <td>2003</td> <td>168.39</td> </tr> </tbody> </table>	Replanting year	Division/Initial Planting year	Hectarage	2021	Div.II: 1994	173.33 Ha	2022	Div.II: 1994	72.58 Ha	Div.III: 1994	95.03 Ha	Replanting year	Division/Planting year	Hectarage (Ha)	2018	1992, 1996	202.75	2019	1992, 1993, 1996	195.93	2020	1993, 1996	165.77	2021	1992, 1994, 1996	178.60	2022	1993, 1995	220.71	2023	1995	190.52	2024-2027	Planting holiday	0	2028	2003	168.39	<p>Not applicable N/A</p>
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7.3.2	<p>Reports of comprehensive HCV assessment, which involves stakeholder consultation and includes record of land-use change since November 2005, shall be available. This HCV assessment shall be conducted prior to any conversion or new planting.</p> <p>- Major compliance –</p>	<p>See Criterion 7.3.1</p>	<p>Not applicable N/A</p>																																						
7.3.3	<p>Records of land preparation and clearing dates shall be available.</p> <p>- Minor compliance –</p>	<p>See Criterion 7.3.1</p>	<p>Not applicable N/A</p>																																						
7.3.4	<p>An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower’s relevant operational</p>	<p>See Criterion 7.3.1</p>	<p>Not applicable N/A</p>																																						

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Criterion / Indicator	Assessment Findings	Compliance
	procedures. (see Criterion 5.2) - Major compliance –	
7.3.5	Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2). - Minor compliance -	Not applicable N/A
Criterion 7.4: Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.		
7.4.1	Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. - Minor compliance -	Not applicable N/A
7.4.2	Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts.	Not applicable N/A

There was no new planting after November 2005. The criterion 7.4 was not applicable.
 In Tolan Estate, from old maps and documentation, it was found that the oil palm:

- Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980;
- Oil palm planted in 2008 was originated from oil palm planted in 1980;
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Replanting Plan Tolan Estate:

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- Major compliance -																																								
Criterion 7.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.																																								
7.5.1 Evidence shall be available that affected local peoples understand they have the right to say 'no' 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 grower/miller is signed and ratified by these local peoples. - Major compliance -	There was no new planting after November 2005. The criterion 7.5 was not applicable. In Tolan Estate, from old maps and documentation, it was found that the oil palm: <ul style="list-style-type: none"> - Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980; - Oil palm planted in 2008 was originated from oil palm planted in 1980; - Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982; - Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982; - Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982; Replanting Plan Tolan Estate: <table border="1" data-bbox="715 1048 1193 1182"> <thead> <tr> <th>Replanting year</th> <th>Division/Initial Planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>Div.II: 1994</td> <td>173.33 Ha</td> </tr> <tr> <td rowspan="2">2022</td> <td>Div.II: 1994</td> <td>72.58 Ha</td> </tr> <tr> <td>Div.III: 1994</td> <td>95.03 Ha</td> </tr> </tbody> </table> It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994. Perlabian Estate: <table border="1" data-bbox="715 1299 1228 1568"> <thead> <tr> <th>Replanting year</th> <th>Division/Planting year</th> <th>Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1992, 1996</td> <td>202.75</td> </tr> <tr> <td>2019</td> <td>1992, 1993, 1996</td> <td>195.93</td> </tr> <tr> <td>2020</td> <td>1993, 1996</td> <td>165.77</td> </tr> <tr> <td>2021</td> <td>1992, 1994, 1996</td> <td>178.60</td> </tr> <tr> <td>2022</td> <td>1993, 1995</td> <td>220.71</td> </tr> <tr> <td>2023</td> <td>1995</td> <td>190.52</td> </tr> <tr> <td>2024-2027</td> <td>Planting holiday</td> <td>0</td> </tr> <tr> <td>2028</td> <td>2003</td> <td>168.39</td> </tr> </tbody> </table>	Replanting year	Division/Initial Planting year	Hectarage	2021	Div.II: 1994	173.33 Ha	2022	Div.II: 1994	72.58 Ha	Div.III: 1994	95.03 Ha	Replanting year	Division/Planting year	Hectarage (Ha)	2018	1992, 1996	202.75	2019	1992, 1993, 1996	195.93	2020	1993, 1996	165.77	2021	1992, 1994, 1996	178.60	2022	1993, 1995	220.71	2023	1995	190.52	2024-2027	Planting holiday	0	2028	2003	168.39	Not applicable N/A
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Criterion 7.6: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.																																								
7.6.1 Documented identification and assessment of demonstrable legal, customary and user rights shall be available. - Major compliance -	There was no new planting after November 2005. The criterion 7.6 was not applicable. In Tolan Estate, from old maps and documentation, it was found that the oil palm: <ul style="list-style-type: none"> - Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980; - Oil palm planted in 2008 was originated from oil palm planted in 1980; - Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982; - Oil palm planted in 2011 was originated from oil 	Not applicable N/A																																						

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<p>7.6.3</p>	<p>A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place. - Major compliance -</p>	<p>See Criterion 7.6.1</p>	<p>Not applicable N/A</p>																																					
<p>7.6.4</p>	<p>Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development. - Minor compliance -</p>	<p>See Criterion 7.6.1</p>	<p>Not applicable N/A</p>																																					
<p>7.6.5</p>	<p>The process and outcome of any compensation claims shall be documented and made publicly available. - Minor compliance -</p>	<p>See Criterion 7.6.1</p>	<p>Not applicable N/A</p>																																					
<p>7.6.6</p>	<p>Evidence shall be available that the affected communities and rights holders have access to 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. - Minor compliance -</p>	<p>See Criterion 7.6.1</p>	<p>Not applicable N/A</p>																																					
<p>Criterion 7.7:</p>																																								

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Criterion / Indicator	Assessment Findings	Compliance																																						
<p>No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.</p>																																								
<p>7.7.1</p> <p>There shall be no land preparation by burning, other than in specific situations, as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Major compliance -</p>	<p>There was no new planting after November 2005. The criterion 7.7 was not applicable.</p> <p>In Tolan Estate, from old maps and documentation, it was found that the oil palm:</p> <ul style="list-style-type: none"> - Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980; - Oil palm planted in 2008 was originated from oil palm planted in 1980; - Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982; - Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982; - Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982; <p>Replanting Plan Tolan Estate:</p> <table border="1" data-bbox="715 920 1273 1055"> <thead> <tr> <th>Replanting year</th> <th>Division/Initial Planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>Div.II: 1994</td> <td>173.33 Ha</td> </tr> <tr> <td rowspan="2">2022</td> <td>Div.II: 1994</td> <td>72.58 Ha</td> </tr> <tr> <td>Div.III: 1994</td> <td>95.03 Ha</td> </tr> </tbody> </table> <p>It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.</p> <p>Perlabian Estate:</p> <table border="1" data-bbox="715 1173 1230 1440"> <thead> <tr> <th>Replanting year</th> <th>Division/Planting year</th> <th>Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1992, 1996</td> <td>202.75</td> </tr> <tr> <td>2019</td> <td>1992, 1993, 1996</td> <td>195.93</td> </tr> <tr> <td>2020</td> <td>1993, 1996</td> <td>165.77</td> </tr> <tr> <td>2021</td> <td>1992, 1994, 1996</td> <td>178.60</td> </tr> <tr> <td>2022</td> <td>1993, 1995</td> <td>220.71</td> </tr> <tr> <td>2023</td> <td>1995</td> <td>190.52</td> </tr> <tr> <td>2024-2027</td> <td>Planting holiday</td> <td>0</td> </tr> <tr> <td>2028</td> <td>2003</td> <td>168.39</td> </tr> </tbody> </table>	Replanting year	Division/Initial Planting year	Hectarage	2021	Div.II: 1994	173.33 Ha	2022	Div.II: 1994	72.58 Ha	Div.III: 1994	95.03 Ha	Replanting year	Division/Planting year	Hectarage (Ha)	2018	1992, 1996	202.75	2019	1992, 1993, 1996	195.93	2020	1993, 1996	165.77	2021	1992, 1994, 1996	178.60	2022	1993, 1995	220.71	2023	1995	190.52	2024-2027	Planting holiday	0	2028	2003	168.39	<p>Not applicable N/A</p>
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<p>7.7.2</p> <p>In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Minor compliance -</p>	<p>See Criterion 7.7.1</p>	<p>Not applicable N/A</p>																																						
<p>Criterion 7.8: New plantation developments are designed to minimise net greenhouse gas emissions.</p>																																								
<p>7.8.1</p> <p>The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated.</p>	<p>There was no new planting after November 2005. The criterion 7.8 was not applicable.</p> <p>In Tolan Estate, from old maps and documentation, it was found that the oil palm:</p> <ul style="list-style-type: none"> - Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980; - Oil palm planted in 2008 was originated from oil 	<p>Not applicable N/A</p>																																						

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Criterion / Indicator	Assessment Findings	Compliance																																						
<p>- Major compliance -</p>	<p>palm planted in 1980;</p> <ul style="list-style-type: none"> - Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982; - Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982; - Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982; <p>Replanting Plan Tolan Estate:</p> <table border="1" data-bbox="715 622 1273 757"> <thead> <tr> <th>Replanting year</th> <th>Division/Initial Planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>Div.II: 1994</td> <td>173.33 Ha</td> </tr> <tr> <td rowspan="2">2022</td> <td>Div.II: 1994</td> <td>72.58 Ha</td> </tr> <tr> <td>Div.III: 1994</td> <td>95.03 Ha</td> </tr> </tbody> </table> <p>It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.</p> <p>Perlabian Estate:</p> <table border="1" data-bbox="715 875 1230 1144"> <thead> <tr> <th>Replanting year</th> <th>Division/Planting year</th> <th>Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1992, 1996</td> <td>202.75</td> </tr> <tr> <td>2019</td> <td>1992, 1993, 1996</td> <td>195.93</td> </tr> <tr> <td>2020</td> <td>1993, 1996</td> <td>165.77</td> </tr> <tr> <td>2021</td> <td>1992, 1994, 1996</td> <td>178.60</td> </tr> <tr> <td>2022</td> <td>1993, 1995</td> <td>220.71</td> </tr> <tr> <td>2023</td> <td>1995</td> <td>190.52</td> </tr> <tr> <td>2024-2027</td> <td>Planting holiday</td> <td>0</td> </tr> <tr> <td>2028</td> <td>2003</td> <td>168.39</td> </tr> </tbody> </table>	Replanting year	Division/Initial Planting year	Hectarage	2021	Div.II: 1994	173.33 Ha	2022	Div.II: 1994	72.58 Ha	Div.III: 1994	95.03 Ha	Replanting year	Division/Planting year	Hectarage (Ha)	2018	1992, 1996	202.75	2019	1992, 1993, 1996	195.93	2020	1993, 1996	165.77	2021	1992, 1994, 1996	178.60	2022	1993, 1995	220.71	2023	1995	190.52	2024-2027	Planting holiday	0	2028	2003	168.39	
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<p>7.8.2 There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.</p> <p>- Minor compliance -</p>	<p>See Criterion 7.8.1</p>	<p>Not applicable N/A</p>																																						
<p>Principle 8: Commitment to continual improvement in key areas of activity</p>																																								
<p>Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p>																																								
<p>8.1.1</p>	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas 	<p>The company has implemented the plan for contionus improvement, year 2017 such as:</p> <ul style="list-style-type: none"> - Optimising the yield of FFB production (4.2): by intiating loose fruit collector gang to cut losses. There were 8 mandores with their gang members. Achievement in 2016 (FFB: 82,640.890 ton, loose fruits 7.24%). In 2017 (FFB: 91,207.970 ton, loose fruits 9.13%). - Visit report (internal audit on RSPO PnC) – annually. Last audit conducted on 29-31 January 2018. There were 12 issues raised. All of the issues has followed up, the status is closed. - Reduce the use of paraquat (4.6): Memorandum from “GMO Sumut” No.117/GMO-All Estate/XI/2016, dated 1 December 2015. The memorandum stating the use of paraquat as contact pesticide is not allowed as of 1 January 2017. Target: Zero use of paraquat effective since 1st January 2017. 	<p>Comply</p>																																					

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Criterion / Indicator	Assessment Findings	Compliance
(GHG) emissions (Criteria 5.6 and 7.8); <ul style="list-style-type: none"> • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. - Major compliance -	<ul style="list-style-type: none"> - Release of Sycanus (as predator for nettle caterpillar) recorded under "Berita Acara Pelepasan Sycanus dichotomus", dated 16 June 2017, location in block 14F04 (19.73 Ha of 200 Sycanus), block 14 F01 (4 Ha of 40 Sycanus). - Realization on EFB in Perlabian Estate year 2018, total area 86 Ha with dosage 50 ton EFB/Ha total application 4,340.14 tons. 	

Appendix B: Approved Time Bound Plan

Name of company	Name of Mill	Location	Supply Base	Time Bound Plan	Target Year for RSPO
PT. Agro Muko	Muko Muko Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko estate, S. Betung estate, Tanah rekah estate, Talang Petai estate, S. Kiang estate and KMD	2011	Certified
	Bunga Tanjung Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung estate, Air Bikuk estate, Air Buluh estate and KMD	2011	Certified
			PT. Mukomuko Agro Sejahtera: - Air Majunto estate - Malin Deman estate	2014	Certified
PT. Tolan Tiga	Bukit Maradja Mill	Simalungun Regency, North Sumatera, Indonesia	- Bukit Maradja Estate (PT. Eastern Sumatra Indonesia) - Kerasaan Estate (PT. Kerasaan Indonesia) - PT. Timbang Deli Indonesia	2010 2018	Certified May 2010 Plan to certify
	Perlabian Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian estate and Tolan estate.	2010	Certified May 2010
PT. Umbul Mas Wisesa	Umbul Mas Wisesa Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South estate, UMW North estate and Toton Usaha Mandiri estate	2014	Certified in March 2015
PT. Agro Kati Lama		Musi rawas Regency, South Sumatera, Indonesia		2021	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
PT. Agro Rawas Ulu		Musi rawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
PT. Agro Muara Rupit		Musi rawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
Hargy Oil Palm Limited (HOPL)	Hargy Mill	East of Biiala, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo Mill	50 km East of Biiala, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengen Estate	2009	Certified in April 2009
	Barema Mill	30 km East of Biiala, West	Barema Estate	2014	RSPO Certified in

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		New Britain Province, PNG			April 2014
PT. Dendy Marker Indah Lestari	Dendymarker Indahlestari Palm Oil Mill	Karang Dapo District, Musi Rawas Regency, Sumatera Selatan Province, Inconesia	Bingin Rupit 1 Estate and Bingin Rupit 2 Estate	2015	The most recent acquisition on 1 August 2017. RSPO certified in 2015.

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2017 (February 2017 – January 2018)** for **Perlabian 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 **2017 (February 2017 – January 2018)** for **Perlabian POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.46
PK	0.46

Extraction	%
OER	21.72
KER	5.57

Production	t/yr
FFB Process	198568
CPO Produced	43124.68
PKO Produced	11067.07

Land Use	Ha
OP Planted Area	7968.39
OP Planted on peat	0
Conservation (forested)	83.13
Conservation (non-forested)	0
Total	

Summary of Field Emission and Sink

	Own Crop*	Group	3 rd Party	Total
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	tCO ₂ e	tCO ₂ e /Ha	tCO ₂ e /FFB	tCO ₂ e	tCO ₂ e /Ha	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e/ Ha	tCO ₂ e/ FFB	tCO ₂ e	tCO ₂ e/Ha	tCO ₂ e/ FFB
Emission												
Land Conversion	75350.09	9.46	0.38	0	0	0	0	0	0	75350.09	9.46	0.38
CO ₂ Emission from fertilizer	6868.52	0.86	0.03	0	0	0	0	0	0	6868.52	0.86	0.03
NO ₂ Emmission	6851.93	0.86	0.03	0	0	0	0	0	0	6851.93	0.86	0.03
Fuel Consumption	983.02	0.12	0	0	0	0	0	0	0	983.02	0.12	0
Peat Oxidation	0	0	0	0	0	0	0	0	0	0	0	0
Sink												
Crop Sequestration	-71421.88	-8.96	-0.36	0	0	0	0	0	0	-71421.88	-8.96	-0.36
Conservation Sequestration	0	0	0	0	0	0	0	0	0	0	0	0
Total	18631.68	2.34	0.09	0	0	0	0	0	0	18631.68	2.34	0.09

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	1385.12	0.01
Fuel Consumption	989.18	0
Grid Electricity Utilisation	3761.52	0.02

Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	6135.82	0.03

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*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 (%)	0
Divert to methane captured (flaring) (%)	100
Divert to methane captured (energy generation) (%)	0

Appendix D: General Chain of Custody Requirements for the Supply Chain

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence	Compliance (Yes / No or N/A) For any N/A raised, justification is required.
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Perlabian POM, under PT. Tolan Tiga Indonesia takes legal ownership and physically handles the processing FFB and certified palm products. The RSPO Supply Chain Certification Standard is applicable for Perlabian POM.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Not applicable for this entity. PT. Tolan Tiga Indonesia – Perlabian POM is not a trader or distributor.	N/A
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	RSPO PalmTrace account for Perlabian POM is No.RSPO_PO1000000099	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aid does not accounted into scope of organization.	Yes
5.2 Supply chain model			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	All the supply base for Perlabian POM is certified estates.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Perlabian POM is using CPO Mills Module D: Identity Preserved.	Yes
5.3. Documented Procedures			

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<p>5.3.1</p>	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	<p>Perlabian POM has SOP titled "Prosedur Rantai Pasok dan Mampu Telusur No.ENC/SCC/01" dated January 2018. The latest procedure revised to incorporates and accommodated changes as per RSPO SCCS, June 2017. The procedure explains</p> <ol style="list-style-type: none"> 1. Scope of SOP. 2. Roles and responsibility – for Marketing Department Head Office; Estate Officer; Palm Oil Mill; 3. Procedure <ol style="list-style-type: none"> 4.2.1 The harvesting procedure; 4.2.3 Recording harvest production; 4.2.4 Transporting the FFB and Loose Fruit - indicating the name of Estate, division, date of FFB delivery, transport detail, supervisor name, year of planting, block ID, total of bunches, total loose fruit, average bunch weight, identification of sustainable product "Sustainable Product – IP".; non-certified FFB will bear "Non-certified product" marking; 4.3 Receiving and processing FFB and Loose Fruit <ol style="list-style-type: none"> 4.3.1 Weighing of FFB truck; 4.3.2 Weighbridge ticket verification indicating name of POM, weighbridge ticket number, name of supplying estate, date and hour of FFB weighing, transport detail, year of planting, block ID, gross, tare and nett weight, identification of sustainable product; non-certified FFB will bear "Non-certified product" marking; 4.3.3 Processing of FFB and loose fruit and "Processing Daily Report" which indicate: FFB sustainable, FFB processed per shift, CPO production, PK production, stock CPO sustainable and stock PK sustainable, dispatch CPO and PK, outstanding CPO and PK; 4.4 Sales of CPO and PK; 4.5 Delivery of CPO and PK, to include information on name of buyer, name of transporter, DO number, transport detail, commodity type, certification status, contract number, delivery address. 	<p>Yes</p>
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	<p>Perlabian POM has complete and up-to date records to demonstrate the supply chain with status Identity Preserve are maintained.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • 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 	<p>Perlabian POM has an organization structure, "PT. Tolan Tiga Indonesia – Palm Oil Mill Organization Structure" dated 15 May 2017. The organization structure explained roles and responsibility of each staff in the palm oil</p>	<p>Yes</p>

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	of the organization's procedures for the implementation of this standard.	mill regarding implementation of RSPO SCCS. The mill manager (Mr. Sarwedi) are the one having responsibility, authority and accountability over the implementation of these RSPO SCCS requirements and compliance with all applicable requirements.	
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	Perlabian POM has a procedure for internal audit under "SOP Prosedur Pelaksanaan Kunjungan Rutin dan Internal Audit No.ENC/SOP/02" latest revision January 2018. The procedure stated the scope of internal audit covers fulfilment of supply chain requirement, based on the latest supply chain standard and company procedures. The planned interval is sets two times per year.	Yes
	ii) effectively implements and maintains the standard requirements within its organization	Internal audit carried out as per schedule (two times per year). Internal audit to Perlabian POM dated 25-27 January 2018, whereby one findings related to RSPO SCCS with regards to use of RSPO certificate number stamp for FFB delivery from estates. The findings have been closed on 26 February 2018. Internal audit to PT. Dumai Paricipita Abadi carried out in 12 October 2017. There was 2 findings related to record of incoming CSPO to be completed with copy of Perlabian POM's weighbridge ticket, DO from Perlabian POM, copy of storage tank's weighbridge ticket; other issues related to extension of contract. The action taken: provided incoming and outgoing/shipping of CSPO per contract, completed with all relevant records; Latest contract dated 28 November 2017 – closed December 2017. All internal audit records and reports are maintained.	Yes
5.4. Purchasing and goods in			
5.4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form: <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were 	Perlabian POM has SOP titled "Prosedur Rantai Pasok dan Mampu Telusur No.ENC/SCC/01" dated January 2018. The procedure regulates how Perlabian POM conduct verification on inspecting, receiving and recording incoming FFB from certified supply base – bearing RSPO-certified stamp. All relevant information will be available under the FFB delivery ticket and confirmed under weighbridge ticketing system. Example of records verified:	Yes

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	<p>issued;</p> <ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>1) <i>Surat Pengiriman TBS dari Lapangan</i> (Delivery of FFB from Field), dokumen ditandatangani oleh Sopir, Kerani Buah dan disetujui oleh Asisten Lapangan.</p> <ul style="list-style-type: none"> • "Surat Pengiriman TBS No.PLE/009816"; Loading/harvest dated 9 September 2017; Transport: Truck No.BK9806YG; Source/Seller: Perlabian Estate (PLE) Divisi V; Description: Certified FFB RSPO555208; Planting Year 2005, Block C12A - amount 283 bunches. • "Surat Pengiriman TBS No.TLE/014310"; Loading/harvest dated 9 September 2017; Transport: Truck No.BK8467YF; Source/Seller: Tolan Estate Division IV; Description: Certified FFB RSPO555208; Planting Year 2001, Block E31 - amount 3,800 kg loose fruit; Block E32 - amount 2,210 kg loose fruit; Total 6,010 kg loose fruit. <p>2) <i>Tiket Timbang</i> (Weighbridge ticket):</p> <ul style="list-style-type: none"> • "Tiket timbang No.FFB17019867W"; Date 9 September 2017; Source of FFB/Seller: Perlabian Estate; Transport detail: Truck No.BK9806YG; Transporter: Perlabian Estate; Product: FFB certified RSPO555208 Certified Product IP; Quantity: Nett 6,030 kg. <p>"Tiket timbang No.BRD17005872W"; Date 9 September 2017; Source of FFB/seller: Tolan Estate; Transportation: Truck No.BK8467YF; Transporter: Tolan Estate; Product: FFB certified/loose fruit RSPO 555208 Certified Product IP; Quantity: Nett 5,870 kg.</p>	
	<ul style="list-style-type: none"> • 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>Perlabian POM has a procedure "Rantai Pasok dan Mampu Telusur No.ENC/SCC/01" dated January 2018. Perlabian POM made statement that the certified supply base are RSPO-certified estate only. The FFB comes from PT. Tolan Tiga Indonesia (RSPO certificate No.RSPO 555208): Tolan Estate and Perlabian Estate.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For 	<p>Perlabian POM has a procedure "Rantai Pasok dan Mampu Telusur No.ENC/SCC/01" dated January 2018. The procedure stipulates process to check</p>	<p>Yes</p>

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	<p>sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.</p>	<p>of the validity of the Supply Chain Certification of suppliers, at least annually.</p>	
	<ul style="list-style-type: none"> • A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	<p>Not buying from trader or distributor.</p>	<p>N/A</p>
	<ul style="list-style-type: none"> • The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	<p>Perlabian POM has SOP titled "Prosedur Rantai Pasok dan Mampu Telusur No.ENC/SCC/01" dated January 2018. The procedure regulates how Perlabian POM conduct verification on inspecting, receiving and recording incoming FFB from certified supply base – bearing RSPO-certified stamp. All relevant information will be available under the FFB delivery ticket and confirmed under weighbridge ticketing system. Example of records verified:</p> <p>3) <i>Surat Pengiriman TBS dari Lapangan</i> (Delivery of FFB from Field), dokumen ditandatangani oleh Sopir, Kerani Buah dan disetujui oleh Asisten Lapangan.</p> <ul style="list-style-type: none"> • "Surat Pengiriman TBS No.PLE/009816"; Loading/harvest dated 9 September 2017; Transport: Truck No.BK9806YG; Source/Seller: Perlabian Estate (PLE) Divisi V; Description: Certified FFB RSPO555208; Planting Year 2005, Block C12A - amount 283 bunches. • "Surat Pengiriman TBS No.TLE/014310"; Loading/harvest dated 9 September 2017; Transport: Truck No.BK8467YF; Source/Seller: Tolan Estate Division IV; Description: Certified FFB RSPO555208; Planting Year 2001, Block E31 - amount 3,800 kg loose fruit; Block E32 – amount 2,210 kg loose fruit; 	<p>Yes</p>

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		<p>Total 6,010 kg loose fruit.</p> <p>4) <i>Tiket Timbang</i> (Weighbridge ticket):</p> <ul style="list-style-type: none"> • "Tiket timbang No.FFB17019867W"; Date 9 September 2017; Source of FFB/Seller: Perlabian Estate; Transport detail: Truck No.BK9806YG; Transporter: Perlabian Estate; Product: FFB certified RSPO555208 Certified Product IP; Quantity: Nett 6,030 kg. <p>"Tiket timbang No.BRD17005872W"; Date 9 September 2017; Source of FFB/seller: Tolan Estate; Transportation: Truck No.BK8467YF; Transporter: Tolan Estate; Product: FFB certified/loose fruit RSPO 555208 Certified Product IP; Quantity: Nett 5,870 kg.</p>	
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	<p>Perlabian POM has a procedure "Rantai Pasok dan Mampu Telusur No.ENC/SCC/01" dated January 2018. The procedure stipulates process to handle non-conforming material and/or documents.</p> <p>This will be reported to certification body.</p>	Yes
5.5. Outsourcing activities			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independement mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>PT. Tolan Tiga Indonesia – Perlabian POM using the service for storage tank, and transporter from independent third party. In all agreement with independent third party:</p> <ul style="list-style-type: none"> - The ownership of product is within PT. Tolan Tiga Indonesia; - The control over product movement is within PT. Tolan Tiga Indonesia; - The independent third party physically handles the RSPO-certified palm products; <p>This clause is applicable to scope of certification.</p>	Yes
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	<p>PT. Tolan Tiga Indonesia using the service for storage tank, and transporter from independent third party. In all agreement with independent third party states clearly that ownership of product is within PT. Tolan Tiga Indonesia.</p> <p>PT. Dumai Paricippta Abadi, Dumai – Riau</p>	Yes

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		<p>Province have allocated dedicated tank No.B.8 capacity 3,150 MT and tank B.15 capacity 3,150 MT. Stock CPO PT. Tolan Tiga Indonesia di PT. Dumai Paricippta Abadi, dated 28 February 2018 was 5,512 MT.</p>	
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>PT. Tolan Tiga Indonesia have contract/agreement with all the independent third party storage tank and transporters. The contract enforce that certification bodies (CB) have access to the outsourcing contractor or operation if an audit is deemed necessary. Agreement between PT. Tolan Tiga Indonesia with storage tank facility sighted: "Perjanjian Sewa Menyewa Tangki Timbun PT. Dumai Paricippta Abadi dan PT. Tolan Tiga Indonesia No.001/DPA/I/2018", signed 3 January 2018. The contract valid from 1 January – 31 December 2018. Chapter 5. Right and Obligation of the Parties – Section 5 stated whenever necessary, PT. Tolan Tiga Indonesia will arrange for certification audits and inform the PT. Dumai Paricippta Abadi (storage tank facility) of audit schedule and requirements. Section 6 stated PT. Dumai Paricippta Abadi (storage tank facility) will cooperate for the audit purpose. PT. Tolan Tiga Indonesia will provide training as necessary.</p> <p>Agreement between PT. Tolan Tiga Indonesia with transporters: "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV. Jasa Sahabat Abadi No.2015/Angkutan/CPO/PL-Dumai/06" signed on 1 December 2016. CV. Jasa Sahabat Abadi issued a statement letter signed by Mr. D***** T*****. The statement "CV Jasa Sahabat Abadi bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV Jasa Sahabat Abadi bersedia dilakukan audit jika badan sertifikasi memerlukannya" – CV Jasa Sahabat Abadi is following requirement from RSPO Supply chain, and CV Jasa Sahabat Abadi available for audit if needed by certification body.</p>	<p>Yes</p>
	<p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>PT.Tolan Tiga Indonesia conducted internal audit to the storage tank facility. Internal audit to PT. Dumai Paricippta Abadi carried out in 12 October 2017. There was 2 findings related to record of incoming CSPO to be completed with</p>	<p>Yes</p>

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		<p>copy of Perlabian POM's weighbridge ticket, DO from Perlabian POM, copy of storage tank's weighbridge ticket; other issues related to extension of contract.</p> <p>The action taken: provided incoming and outgoing/shipping of CSPO per contract, completed with all relevant records; Latest contract dated 3 January 2018 – closed January 2018.</p>	
	<p>d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>	<p>PT. Tolan Tiga Indonesia have contract/agreement with all the independent third party storage tank and transporters. The contract enforce that certification bodies (CB) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>Agreement between PT. Tolan Tiga Indonesia with storage tank facility sighted: "Perjanjian Sewa Menyewa Tangki Timbun PT. Dumai Paricipita Abadi dan PT. Eastern Sumatra Indonesia No.001/DPA/I/2018", signed 31 January 2018. The contract valid from 1 January – 31 December 2018. Chapter 5. Right and Obligation of the Parties – Section 5 stated whenever necessary, PT. Tolan Tiga Indonesia will arrange for certification audits and inform the PT. Dumai Paricipita Abadi (storage tank facility) of audit schedule and requirements. Section 6 stated PT. Dumai Paricipita Abadi (storage tank facility) will cooperate for the audit purpose. PT. Tolan Tiga Indonesia will provide training as necessary.</p> <p>Agreement between PT. Tolan Tiga Indonesia with transporters: "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV. Jasa Sahabat Abadi No.2015/Angkutan/CPO/PL-Dumai/06" signed on 1 December 2016.</p> <p>CV. Jasa Sahabat Abadi issued a statement letter signed by Mr. D***** T*****. The statement "CV Jasa Sahabat Abadi bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV Jasa Sahabat Abadi bersedia dilakukan audit jika badan sertifikasi memerlukannya" – CV Jasa Sahabat Abadi is following requirement from RSPO Supply chain, and CV Jasa Sahabat Abadi available for audit if needed by certification body.</p>	<p>Yes</p>
5.5.3	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO</p>	<p>PT. Tolan Tiga Indonesia have a list of independent third party: - PT. Dumai Paricipita Abadi (storage tank facility), address: Areal Pelabuhan</p>	<p>Yes</p>

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	<p>certified oil palm products.</p>	<p>Dumai, Jalan Datuk Laksamana, Dumai Barat, Riau Province, Indonesia. Contact: Mr. B*** H*****;</p> <ul style="list-style-type: none"> - CV Angkutan Sahabat (transporter), address: Jalan Petumbukan Dusun III, Jaharun B-Galang, Deli Serdang Regency. Contact: Mr. Gun**** R*****. CV. Jasa Sahabat Abadi (transporter), address: Jalan Besar Kisaran Medan km 5 Sidomulyo, Pulo Bandring. Contact: Mr. D***** T*****. 	
<p>5.5.4</p>	<p>The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>PT.Tolan Tiga Indonesia have a list of independent third party:</p> <ul style="list-style-type: none"> - PT. Dumai Paricipata Abadi (storage tank facility), address: Areal Pelabuhan Dumai, Jalan Datuk Laksamana, Dumai Barat, Riau Province, Indonesia. Contact: Mr. B*** H*****; - CV Angkutan Sahabat (transporter), address: Jalan Petumbukan Dusun III, Jaharun B-Galang, Deli Serdang Regency. Contact: Mr. Gun**** R*****. - CV. Jasa Sahabat Abadi (transporter), address: Jalan Besar Kisaran Medan km 5 Sidomulyo, Pulo Bandring. Contact: Mr. D***** T*****. <p>The list updated on March 2018.</p>	<p>Yes</p>
<p>5.6. Sales and goods out</p>			
<p>5.6.1</p>	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>Audit team reviewed all the respective documents related to sales of CSPO and CSPK. Sampled traced down from PalmTrace TR-6bb0dfe2-9249 dated 11 September 2017 for 647.97 MT CPO SG to O***** S***.</p> <ul style="list-style-type: none"> - Name and address of buyer: O***** S***, Rotterdam. - Name and address of Seller: PT. Tolan Tiga Indonesia , Gedung Bank Sumut lantai 7 Jl Imam Bonjol No.18 Madras Hulu – Medan Polonia 20152. - Delivery date: 9 November 2017 - Date on which document issued: Shipping instruction issue date 5 November 2017. - Description of product: CPO RSPO SG. - Quantity of product: total as per Delivery Order 647.97 MT. - Related transport document: Bill of Lading No.DUM/ROT-06 and DUM/HAM-08 dated 9 November 2017. - Supply chain certificate number of the seller: RSPO555208. Unique identification number: Dispatch slip No.PK1800009W. DO No.2018/BM-PK/DO/01. Contract 	<p>Yes</p>

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	<ul style="list-style-type: none"> 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>No.2018/BM-PK/01.</p> <p>Information available in different document: Sales contract PT. Tolan Tiga Indonesia, Gedung Bank Sumut lantai 7 Jl Imam Bonjol No.18 Madras Hulu – Medan Polonia 20152 and buyer O***** S***. The contract for 647.97 tons CPO RSPO SG.</p> <p>TR-6bb0dfe2-9249 dated 11 September 2017 for 647.97 MT CPO SG. PalmTrace code Perlabian POM RSPO_PO1000000099; dated shipping announcement created 11 September 2017.</p> <p>Shipping Instruction PT. Tolan Tiga Indonesia, Medan; No.2017/TTI-SI/08 dated 5 November 2017 for 2,000 MT of commodity "Indonesian Crude Sustainable Palm Oil SG". Certificate No.RSPO 555208. Buyer O***** S***. Port of discharge Hamburg, Germany. Vessel MT SC Taurus.</p> <p>To fulfill the contract/DO – Perlabian POM dispatched CPO with weighbridge ticket: - Dispatch Slip No.CPO17001278W dated 24 October 2017. Vehicle BK8531CO. Transporter CV Pengangkutan Sahabat. Loading at PT. Tolan Tiga Indonesia – Perlabian POM. Destination Storage Tank PT. Dumai Paricippta Abadi, Dumai. DO No.09/SB/X/2017. DO No.2017/PL-CPO/DO/Dumai/135. Product: RSPO CPO IP. Quantity 25.12 MT. Certificate No.RSPO 555208. Sustainable Product-IP. Receiving slip PT. Dumai Paricippta Abadi No.DPA.IN.171025048, for vehicle No. BK8531CO, dated 25 October 2017. CPO Quantity 25.12 MT. Certificate No.RSPO555208. Sustainable Product-IP. Pumped to tank B.15. - Dispatch Slip No.CPO17001091W dated 19 September 2017. Vehicle BK9245VV. Transporter CV Jasa Sahabat Abadi. Loading at PT. Tolan Tiga Indonesia – Perlabian POM. Destination Storage Tank PT. Dumai Paricippta Abadi, Dumai. DO No.2017/PL-CPO/DO/Dumai/112. Product: RSPO CPO IP. Quantity 27.98 MT. Certificate No.RSPO 555208. Sustainable Product-IP.</p>	
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		<p>Receiving slip PT. Dumai Paricippta Abadi No.DPA.IN.170920099, for vehicle BK9245VV, dated 20 September 2017. CPO Quantity 27.98 MT. Certificate No.RSPO 555208. Sustainable Product-IP. Pumped to tank B.7.</p>	
	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>Transaction: TR-6bb0dfe2-9249 dated 11 September 2017 for 647.97 MT CPO SG to O***** S***. TR-b33ea6c7-c8b9 dated 11 September 2017 for 1,003 MT CPO SG Buyer O***** S***.</p> <p>Shipping Instruction PT. Tolan Tiga Indonesia, Medan; No.2017/TTI-SI/08 dated 5 November 2017 for 2,000 MT of commodity "Indonesian Crude Sustainable Palm Oil SG". Certificate No.RSPO 555208. Buyer O***** S***. Port of discharge Hamburg, Germany. Vessel MT SC Taurus.</p> <p>Shipping Instruction PT. Tolan Tiga Indonesia, Medan; No.2017/TTI-SI/08A dated 5 November 2017 for 2,012 MT of commodity "Indonesian Crude Sustainable Palm Oil SG". Certificate No.RSPO 555208. Buyer O***** S***. Port of discharge Rotterdam. Vessel MT SC Taurus.</p> <p>Shore Calculation at PT. Dumai Paricippta Abadi, based on Shipping Instruction No.2017/TTI-SI/08 and No.2017/TTI-SI/08A for 4,012 MT (2,000 MT + 2,012 MT) CPO RSPO SG for Vessel MT SC Taurus, dated 6-8 November 2017. The CPO pumped from tank No.B8 and B.15 with detail: temperature 49-53^oC; density 0.8877. Quantity 4,012 MT.</p> <p>Bill of Lading No.DUM/ROT-06 and DUM/HAM-08 dated 9 November 2017.</p> <p>List of Shipping for MT. SC Taurus 9 November 2017. The document listed all delivery from Perlabian POM. A total of 112 tankers delivery from Perlabian POM were recorded, for a total of 4,270 MT. Sample seen (as confirmed between storage tank with Bukit Maradja POM):</p> <ul style="list-style-type: none"> - Dispatch Slip No.CPO17001278W dated 24 October 2017. Vehicle BK8531CO. Transporter CV Pengangkutan Sahabat. Loading at PT. Tolan Tiga Indonesia – Perlabian POM. Destination Storage Tank PT. Dumai Paricippta Abadi, Dumai. DO No.09/SB/X/2017. DO No.2017/PL- 	<p>Yes</p>

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		<p>CPO/DO/Dumai/135. Product: RSPO CPO IP. Quantity 25.12 MT. Certificate No.RSPO 555208. Sustainable Product-IP. Receiving slip PT. Dumai Paricipita Abadi No.DPA.IN.171025048, for vehicle No. BK8531CO, dated 25 October 2017. CPO Quantity 25.12 MT. Certificate No.RSPO555208. Sustainable Product-IP. Pumped to tank B.15.</p> <p>- Dispatch Slip No.CPO17001091W dated 19 September 2017. Vehicle BK9245VV. Transporter CV Jasa Sahabat Abadi. Loading at PT. Tolan Tiga Indonesia – Perlabian POM. Destination Storage Tank PT. Dumai Paricipita Abadi, Dumai. DO No.2017/PL-CPO/DO/Dumai/112. Product: RSPO CPO IP. Quantity 27.98 MT. Certificate No.RSPO 555208. Sustainable Product-IP. Receiving slip PT. Dumai Paricipita Abadi No.DPA.IN.170920099, for vehicle BK9245VV, dated 20 September 2017. CPO Quantity 27.98 MT. Certificate No.RSPO 555208. Sustainable Product-IP. Pumped to tank B.7.</p>	
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>PalmTrace code Perlabian POM RSPO_PO1000000099. Registration of transaction verified: TR-6bb0dfe2-9249 dated 11 September 2017 for 647.97 MT CPO SG to O***** S***. TR-b33ea6c7-c8b9 dated 11 September 2017 for 1,003 MT CPO SG Buyer O***** S***.</p>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' 	<p>Audit team trace back all transaction from Perlabian POM: TR-6bb0dfe2-9249 dated 11 September 2017 for 647.97 MT CPO SG to O***** S***. TR-b33ea6c7-c8b9 dated 11 September 2017 for 1,003 MT CPO SG Buyer O***** S***. It was verified the shipping announcement created prior to delivery of certified CPO to buyer. A specific note made for shipping announcement made after delivery.</p>	Yes

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	own standard operating procedures.		
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	Not applicable. PT. Tolan Tiga Indonesia – Perlabian POM only selling RSPO certified CPO and PK.	N/A
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	PT. Tolan Tiga Indonesia – Perlabian POM cleaned out all CPO and PK sold under other scheme at the end of the license validity. Audit team have verified against the three-monthly base report, shipping record in Perlabian POM and shipping instruction at tank storage facility that no double booking/double claim made.	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Not applicable. PT. Tolan Tiga Indonesia – Perlabian POM does not buying RSPO certified CPO and PK.	N/A
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	PT. Tolan Tiga Indonesia – Perlabian POM have prepared a training plan for year 2018. The supply chain/rantai pasok training planned for February 2018. Training RSPO SCCS 2017 carried out on 10 March 2018. Attended by 7 personnel. This including weighbridge operators, dispatch operator, laboratory analyst, document control and production supervisor.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	“Pelatihan RSPO Supply Chain Standard 2017” dated 10 March 2018. Attended by 10 personnel. This including weighbridge operators, dispatch operator, laboratory analyst, document control and production supervisor. Personnel training record sampled: Mrs. Fironica Julianti, have been trained for RSPO P&C on 18 November 2016; Weighbridge work instruction training on 4 February 2017; “Pelatihan RSPO Supply Chain Standard 2017” dated 10 March 2018.	Yes
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	PT. Tolan Tiga Indonesia maintains accurate, complete, up-to-date and accessible records and reports to demonstrate compliance with RSPO SCCS.	Yes

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5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	PT. Tolan Tiga Indonesia – Perlabian POM has a procedure “Rantai Pasok dan Mampu Telusur No.ENC/SCC/01” dated January 2018 stipulates that all records and reports related to supply chain activity shall be retain for minimum of five years.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	PT. Tolan Tiga Indonesia prepares the forecast of FFB, CPO production and PK production for each year. The Perlabian POM keeps up-to-date record of the volume claimed over a period of 12 months. Audit team have verified against the three-monthly base report, shipping record in Perlabian POM and shipping instruction at tank storage facility that no over claimed.	Yes
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	PT. Tolan Tiga Indonesia - Perlabian POM was only processing FFB into CPO and PK. The conversion factors follows daily production report for OER and KER.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	PT. Tolan Tiga Indonesia - Perlabian POM was only processing FFB into CPO and PK. The conversion factors follows daily production report for OER and KER. OER and KER recorded and analyzed on daily basis as recorded in “Laporan Produksi Harian” and “Laporan laboratorium”.	Yes
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	PT. Tolan Tiga Indonesia - Perlabian POM does not make claims. All CPO and PK sold and delivered as bulk. Audit team found that no violation against RSPO Rules on Communication and Claims, 2016.	Yes
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	PT. Tolan Tiga Indonesia have a procedure to handle complaints related to RSPO SCCS, as in “Customers Complaints Handling No.MKT-03-02/02-10-2017/rev0 dated 20 November 2017. No complaint related to RSPO SCCS and/or product quality received in 2017.	Yes

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5.13. Management Review			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Management review carried out once per year – at minimum, in consistent manner. Management review dated 13 March 2018.	Yes
5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	<p>The latest management review dated 13 March 2018, discussing 2017 performance. The meeting has discusses all relevant input:</p> <ul style="list-style-type: none"> - Result of internal audit covering RSPO SCCS: Discussed. From internal audit dated 25-27 January 2018; - Customer feedback: Discussed. No negative complaint. - Status of preventive and corrective action: Discussed. The findings related to RSPO SCCS stamps have been closed on 26 February 2018. - Follow up actions from latest management review: Discussed. No outstanding NC related to RSPO Supply Chain Certification Standard from previous management review meeting in 2017. - Changes that could affect the management system: Discussed. The RSPO SCCS 2017 requirement. - Recommendation for improvement: Discussed. Training for RSPO SCCS 2017 have been done in 10 March 2018. 	Yes
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	<p>The latest management review dated 13 March 2018. The meeting has proposed relevant output:</p> <ul style="list-style-type: none"> - Improvement of the effectiveness of the management system and its process: Discussed. To improve the control related to mill operation, to consistently implement RSPO SCCS 2017. - Resource needs: Discussed. More training needed – to ensure the knowledge for the standard RSPO SCCS 2017. Control for outsourcing in tank storage. 	Yes

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Appendix E: CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: Identity Preserved)

Requirements	Compliance
D.1 Definition	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ 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 without physically separating them, then only Module E is applicable.</p>	<p>Perlabian POM implements Module D CPO Mills: Identity Preserved. All FFB received by Perlabian POM comes from company-owned RSPO-certified estates.</p> <p>Perlabian Palm Oil Mill currently holding valid RSPO P&C certificate No.RSPO 555208, valid until 16 May 2020, with current supply chain standard RSPO SCCS Module D – Identity Preserved, the palm oil mill’s supply base only consist of company-owned estates namely Tolan Estate and Perlabian Estate.</p> <p>Comply</p>
D.2 Explanation	
<p>E.2.1 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. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit 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 estimate tonnage of RSPO-certified FFB, CPO and PK are available in the estates and Perlabian POM annual production budget for 12 months since last assessment. The FFB tonnage received from all certified supply bases. The certified supply base is coming from Perlabian and Tolan Estate. This has been recorded in this public summary report.</p> <p>Comply</p>
<p>D.2.2 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>	<p>Company holds RSPO IT Platform account, PalmTrace registration under PT. Tolan Tiga Indonesia - Perlabian POM. PalmTrace code Perlabian POM RSPO_PO1000000099.</p> <p>Comply</p>
D.3 Documented procedures	
<p>D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>Perlabian POM has SOP titled “Prosedur Rantai Pasok dan Mampu Telusur No.ENC/SCC/01” dated January 2018. The latest procedure revised to incorporates and accommodated changes as per RSPO SCCS, June 2017.</p> <p>The procedure explains</p> <ol style="list-style-type: none"> 4. Scope of SOP. 5. Roles and responsibility – for Marketing Department Head Office; Estate Officer; Palm Oil Mill; 6. Procedure <ol style="list-style-type: none"> 4.2.1 The harvesting procedure; 4.2.3 Recording harvest production; 4.2.4 Transporting the FFB and Loose Fruit - indicating the name of Estate, division, date of FFB delivery, transport detail, supervisor name, year of planting, block ID, total of bunches, total loose fruit, average bunch weight, identification of

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	<p>sustainable product "Sustainable Product – IP".; non-certified FFB will bear "Non-certified product" marking;</p> <p>4.3 Receiving and processing FFB and Loose Fruit</p> <p>4.3.1 Weighing of FFB truck;</p> <p>4.3.2 Weighbridge ticket verification indicating name of POM, weighbridge ticket number, name of supplying estate, date and hour of FFB weighing, transport detail, year of planting, block ID, gross, tare and nett weight, identification of sustainable product; non-certified FFB will bear "Non-certified product" marking;</p> <p>4.3.3 Processing of FFB and loose fruit and "Processing Daily Report" which indicate: FFB sustainable, FFB processed per shift, CPO production, PK production, stock CPO sustainable and stock PK sustainable, dispatch CPO and PK, outstanding CPO and PK;</p> <p>4.4 Sales of CPO and PK;</p> <p>4.5 Delivery of CPO and PK, to include information on name of buyer, name of transporter, DO number, transport detail, commodity type, certification status, contract number, delivery address.</p> <p>Comply</p>
<p>b) 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 site's procedures for the implementation of this standard.</p>	<p>Perlabian POM has an organization structure, "PT. Tolan Tiga Indonesia – Palm Oil Mill Organization Structure" dated 15 May 2017. The organization structure explained roles and responsibility of each staff in the palm oil mill regarding implementation of RSPO SCCS.</p> <p>The mill manager (Mr. Sarwedi) are the one having responsibility, authority and accountability over the implementation of these RSPO SCCS requirements and compliance with all applicable requirements. Interview with the mill manager, he does aware of the latest RSPO SCCS 2017 requirements.</p> <p>Comply</p>
<p>D.3.2 The site shall have documented procedures for receiving and processing certified FFBs.</p>	<p>Perlabian POM has SOP titled "Prosedur Rantai Pasok dan Mampu Telusur No.ENC/SCC/01" dated January 2018. The procedure regulates how Perlabian POM conduct verification on inspecting, receiving and recording incoming FFB from certified supply base – bearing RSPO-certified stamp.</p> <p>All relevant information will be available under the FFB delivery ticket and confirmed under weighbridge ticketing system.</p> <p>Comply</p>
<p>D.4 Purchasing and goods in</p>	
<p>D.4.1 The site shall verify and document the tonnage and sources of certified FFBs received.</p>	<p>Example of records verified:</p> <p><i>Surat Pengiriman TBS dari Lapangan</i> (Delivery of FFB from Field), dokumen ditandatangani oleh Sopir, Kerani Buah dan disetujui oleh Asisten Lapangan.</p> <ul style="list-style-type: none"> • "Surat Pengiriman TBS No.PLE/009816"; Loading/harvest dated 9 September 2017; Transport: Truck No.BK9806YG; Source/Seller: Perlabian Estate (PLE) Divisi V; Description: Certified FFB RSPO555208; Planting Year 2005, Block C12A - amount 283 bunches. • "Surat Pengiriman TBS No.TLE/014310"; Loading/harvest dated 9 September 2017; Transport: Truck No.BK8467YF;

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	<p>Source/Seller: Tolan Estate Division IV; Description: Certified FFB RSPO555208; Planting Year 2001, Block E31 - amount 3,800 kg loose fruit; Block E32 – amount 2,210 kg loose fruit; Total 6,010 kg loose fruit.</p> <p><i>Tiket Timbang</i> (Weighbridge ticket):</p> <ul style="list-style-type: none"> • "Tiket timbang No.FFB17019867W"; Date 9 September 2017; Source of FFB/Seller: Perlabian Estate; Transport detail: Truck No.BK9806YG; Transporter: Perlabian Estate; Product: FFB certified RSPO555208 Certified Product IP; Quantity: Nett 6,030 kg. <p>"Tiket timbang No.BRD17005872W"; Date 9 September 2017; Source of FFB/seller: Tolan Estate; Transportation: Truck No.BK8467YF; Transporter: Tolan Estate; Product: FFB certified/loose fruit RSPO 555208 Certified Product IP; Quantity: Nett 5,870 kg.</p> <p>Comply</p>
D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	<p>No overproduction in Perlabian POM.</p> <p>Comply</p>
D.5 Record keeping	
D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	<p>PT. Tolan Tiga Indonesia maintains accurate, complete, up-to-date and accessible records and reports to demonstrate compliance with RSPO SCCS. This is comprise of daily report, monthly report and three-monthly report whereby recording the amount of FFB received; FFB processed, CPO and PK production; and CPO and PK dispatched – including the balance/stock.</p> <p>Comply</p>
D.6 Processing	
D.6.1 The site 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 product including during transport and storage to strive for 100% separation.	<p>Based on audit, no commingling risk because Perlabian POM only received FFB from certified estate, Perlabian Estate and Tolan Estate.</p> <p>Comply</p>

Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (MT)	Volume of FFB from uncertified supply bases (MT)	Total FFB/Month (MT)
1	May 2017	15,392	Nil	15,392
2	June 2017	12,804	Nil	12,804
3	July 2017	18,906	Nil	18,906
4	August 2017	18,330	Nil	18,330
5	September 2017	18,873	Nil	18,873
6	October 2017	18,558	Nil	18,558
7	November 2017	19,228	Nil	19,228

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8	December 2017	16,533	Nil	16,533
9	January 2018	19,393	Nil	19,393
10	February 2018	15,855	Nil	15,855
11	March 2018*	14,822	Nil	14,822
12	April 2018*	14,007	Nil	14,007
		202,701		202,701

**) The production record for March and April 2018 was an forecast, as audit carried out in March 2018*

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	May 2017	3,407	799
2	June 2017	2,760	669
3	July 2017	4,069	1,037
4	August 2017	3,318	1,015
5	September 2017	4,231	1,056
6	October 2017	4,176	1,077
7	November 2017	4,368	1,111
8	December 2017	3,825	933
9	January 2018	4,280	1,092
10	February 2018	3,416	870
11	March 2018*	3,283	815
12	April 2018*	3,102	770
		44,235	11,244

**) The production record for March and April 2018 was an forecast, as audit carried out in March 2018*

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading No	Certified CPO Sold (MT)	Certified PK Sold (MT)
May 2017	Buyer I	TR-3ae1bbec-f758 dated 9 May 2017		770
Jun 2017	Buyer I	TR-7666c0d0-a362 dated 12 June 2017		880
Jul 2017	Buyer I	TR-3c8ea574-46dc dated 15 July 2017		850
		TR-8c117e01-cc32 dated 26 July 2017		658
Aug 2017	-	-		
Sept 2017	Buyer O	TR-8f0ecf5d-5002 dated 8 September 2017		1,100
		TR-10b3918d-2703 dated 15 September 2017	2,000	
		TR-ed594748-1140 dated 15 September 2017	500	
		TR-969814f8-3008 dated 15 September 2017	1,000	
		TR-de391ac7-76ec dated 15 September 2017	1,000	
		TR-fec19951-f1f2 dated 15 September 2017	500	
		TR-77d529d1-dcea dated 15 September 2017	999.98	
Oct 2017	Buyer I	TR-b8f95592-a11d dated 4 October 2017		1,056
Nov 2017	Buyer I	TR-72224109-fd3f dated 7 November 2017		1,350
	Buyer O	TR-1f1277f7-137d dated 7 November 2017	1,000	
		TR-a57845e2-c8ab dated 7 November 2017	1,000	
		TR-5ffde517-366e dated 7 November 2017	1,006	
		TR-f8bd0bbb-03d2 dated 7 November 2017	1,005.98	
Dec 2017	Buyer I	TR-f2a1e726-8cb9 dated 8 December 2017		906
Jan 2018	Buyer I	TR-004fbb82-12a9 dated 5 January 2018		931.08
	Buyer M	TR-c6b7b236-0861 dated 16 January 2018		300
		TR-d58b533d-64e5 dated 25 January 2018		550

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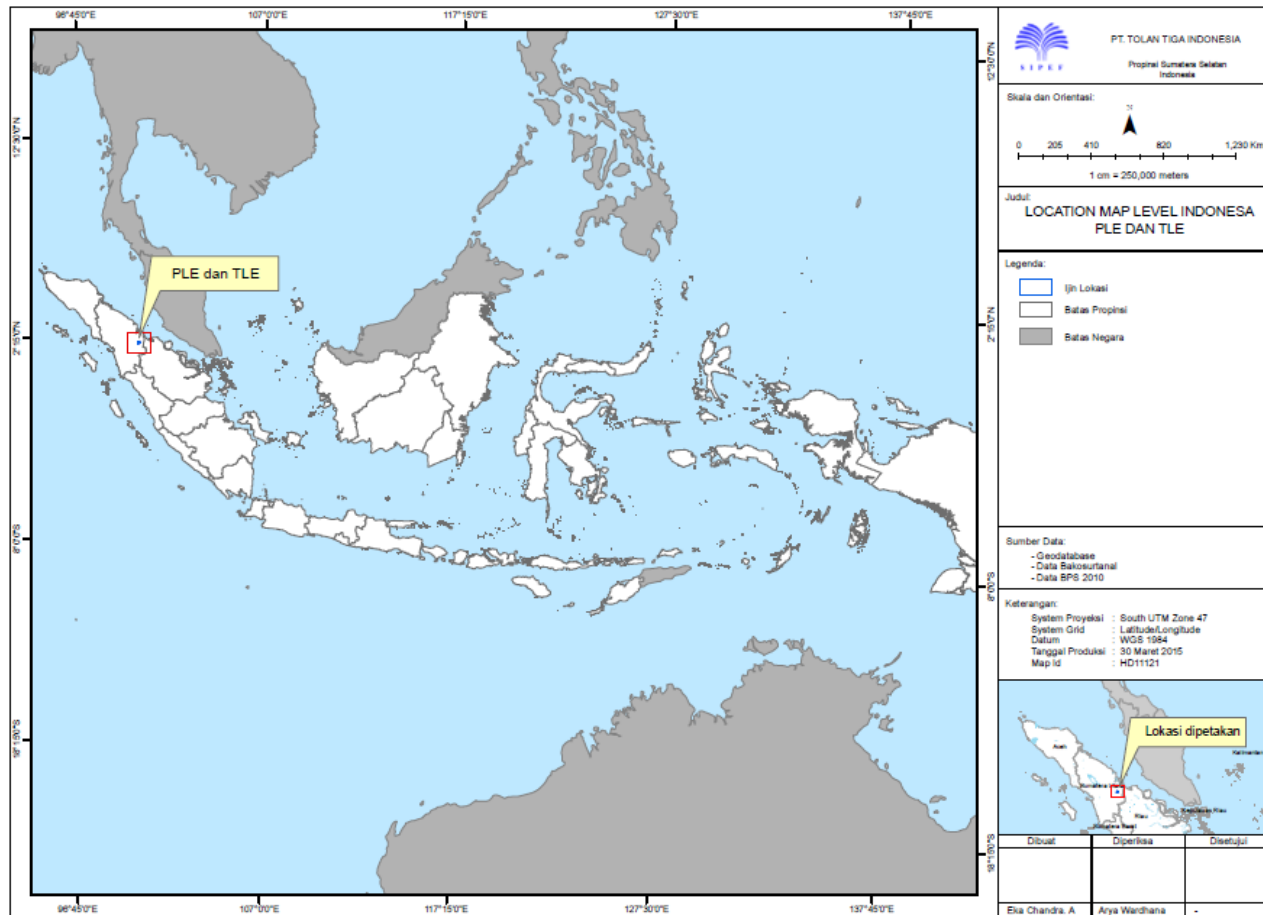
Feb 2018	Buyer M	TR-b4941ca0-fe99 dated 2 February 2018		300
Mar 2018	Buyer M	TR-946af837-b7a4 dated 13 March 2018		600
	Buyer O	TR-3fd73a69-8c4f dated 29 March 2018	999.98	
		TR-6e4671a7-4688 dated 29 March 2018	1,000	
		TR-9ee3252f-e82e dated 29 March 2018	1,000	
Apr 2018	-			
			13,012	10,251.08

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (MT)	PK Sold (MT)
May 2017	Buyer O	ISCC	2,000	-
June 2017	Buyer O	ISCC	2,000	-
July 2017	Buyer O	ISCC	2,000	-
August 2017	Buyer O	ISCC	2,000	-
September 2017	-	-	-	-
October 2017	Buyer O	ISCC	2,999	-
November 2017	-	-	-	-
December 2017	Buyer O	ISCC	3,000	-
January 2018	Buyer O	ISCC	3,000	-
February 2018	Buyer O	ISCC	3,000	-
March 2018	-	-	-	-
April 2018	-	-	-	-
			19,999	0

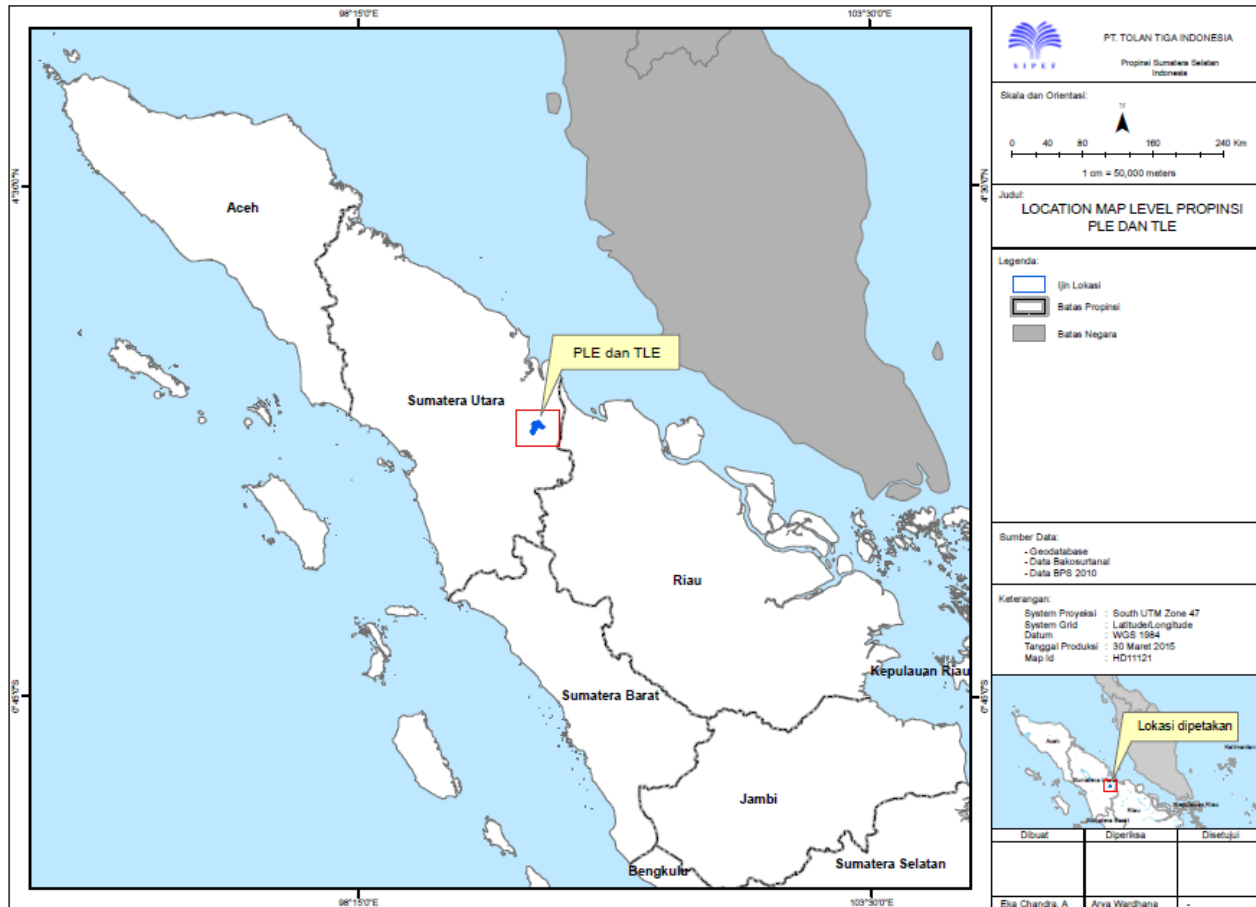
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
May 2017	-	-	-
June 2017	Buyer A	100	-
July 2017	Buyer A	500	-
August 2017	Buyer A	200	-
September 2017	-	-	-
October 2017	Buyer A	150	-
November 2017	Buyer A	100	-
December 2017	Buyer A	100	-
January 2018	-	-	-
February 2018	-	-	-
March 2018	-	-	-
April 2018	-	-	-
		1,150	0

F. Records of Certified CPO & PK Sold under RSPO Credits to Buyers since the last audit			
No.	Buyers Name	PalmTrace Trading No	RSPO Credits of Certified CPO Sold (MT)
Nil			

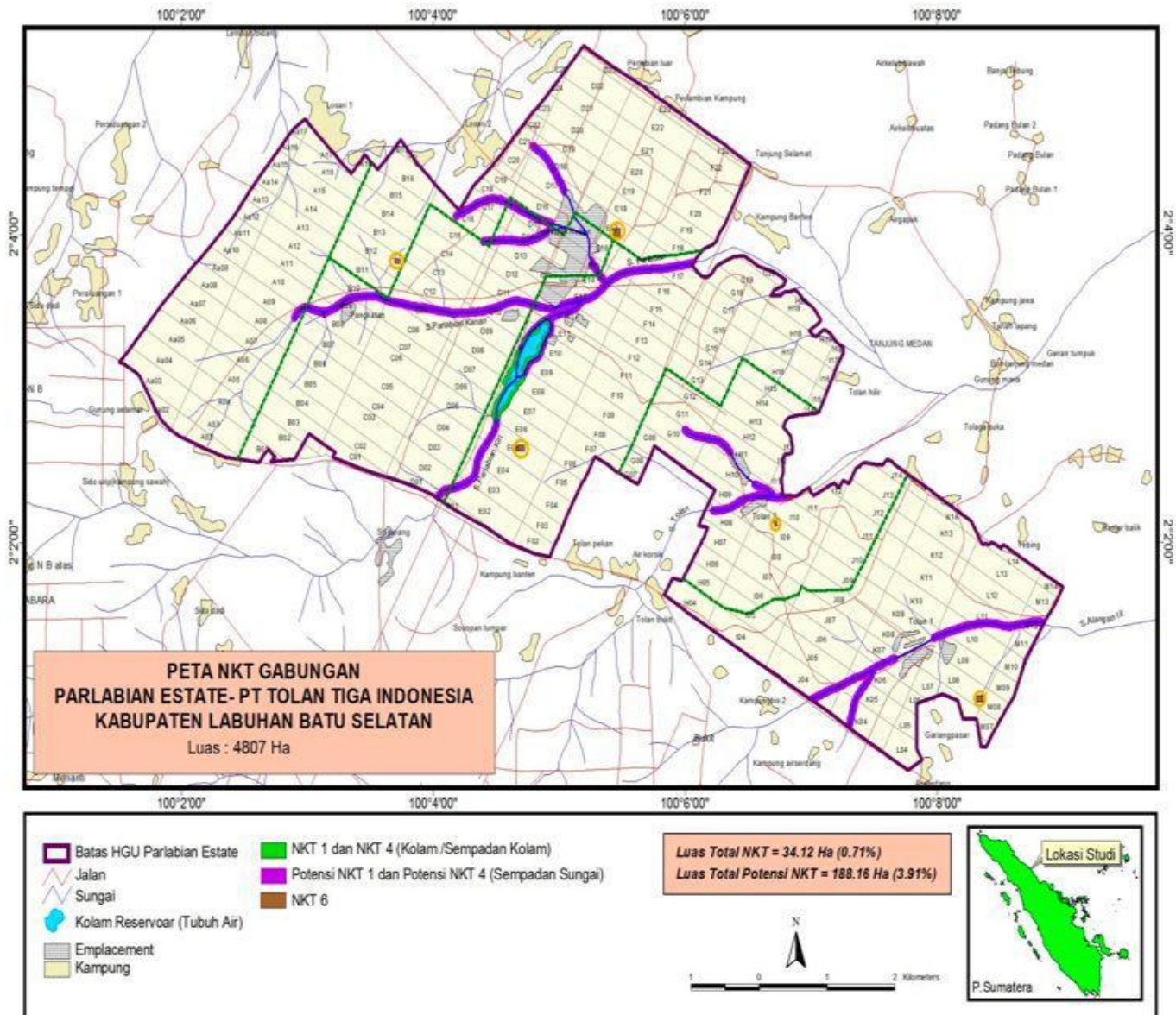
Appendix F: Location Map of Certification Unit and Supply bases



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Appendix G: Estate Field Map



Appendix H: List of Smallholder Sampled

Not Applicable

Appendix I: List of Abbreviations

AMDAL	Analisis Mengenai Dampak Lingkungan – Social Environmental Impact Assessment
BLH	Badan Lingkungan Hidup
BOD	Biological Oxygen Demand
CD	Community Development
CPO	Crude Palm Oil
CSR	Corporate Social Responsibility
EFB	Empty Fruit Bunch
EMS	Environmental Management System
ENC	Environment and Conservation Department
FA	Field Assisstant
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
GRTG	Ganti Rugi Tanah Garapan – Compensation upon land used
GRTT	Ganti Rugi Tanam Tumbuh – Compensation upon planting
HCV	High Conservation Value
HGU	Hak Guna Usaha – Legal ownership of the land
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
KER	Kernel Extraction Rate
LD ₅₀	Lethal Dosage on 50
MCA	Manager Corporate Affair
MSDS	Material Safety Data Sheet
NPP	New Planting Procedure
OER	Oil Extraction Rate
PK	Palm Kernel
PKB	Perjanjian Kerja Bersama – Collective Work Agreement
POM	Palm Oil Mill
PPE	Personal Protective Equipment
PUK	Pengurus Unit Kerja – Unit's Committee
RED	Renewable Energy Directive
RKL	Rencana Pengelolaan Lingkungan – Environmental Management Plan
RPL	Rencana Pemantauan Lingkungan – Environmental Monitoring Plan
RSPO	Roundtable on Sustainable Palm Oil
RSPO P&C	Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social and Environmental Impact Assessment
SIA	Social Impact Assessment
SK	Surat Keputusan – Decree Letter
SKT	Surat Keterangan Tanah – Land Letter
SOP	Standard Operating Procedure
SPTTM	Serikat Pekerja Tolan Tiga Mandiri – worker union PT. Tolan Tiga Indonesia
TTI	PT. Tolan Tiga Indonesia