

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment** (Choose an item.)
- Recertification Assessment (RA 2)**
- Extension of Scope**

Client Company name (Parent Company): PT Inti Indosawit Subur
Client company Address: Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia
Certification Unit: PT Inti Indosawit Subur – Buatan I
Location of Certification Unit: Delik/Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau Province, Indonesia
Date of Final Report: 24/08/2021

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Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	06/02/2006
Address	Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Inti Indosawit Subur – Buatan I Palm Oil Mill		
Location / Address	Delik/Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr. Putu Ghrayte Yonata Aksa	E-mail	Putu_Aksa@asianagri.com
Telephone	+62 21 2301119	Facsimile	+62 21 2301120

2. Certification Information			
Certificate Number	RSPO 638918	Date of First Certification	16/09/2010
		Certificate Start Date	24/08/2021
		Certificate Expiry Date	23/08/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity and consistency of Buatan I Palm Oil Mill and its supply bases with RSPO Principle and Criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Annual Surveillance Assessment (RA Choose an item. ; ASA Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
Supply Chain Module	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
SGS-ID-ISPO-0032	ISPO	SGS	20 Mar 2024
EU-ISCC-Cert-DE100-20452021	ISCC	SGS	02 Feb 2022
ID05/65250	ISO 14001:2015	SGS	10 June 2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Buatan I Palm Oil Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	00° 26' 04.00" N	101° 49' 30.00" E
Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	00° 30' 37.00" N	101° 49' 06.00" E
KUD Bhakti Mandiri	Bukit Harapan Village, Kerinci Kanan District, Siak Regency, Riau	00° 29' 16.00" N	101° 47' 47.20" E
KUD Jaya Makmur	Kumbara Utama Village, Kerinci Kanan District, Siak Regency, Riau	00° 29' 56.80" N	101° 47' 31.40" E
KUD Sumber Rejeki	Bukit Agung Village, Kerinci Kanan District, Siak Regency, Riau	00° 25' 50.30" N	101° 48' 49.60" E
KUD Sejahtera	Makmur Village, Kerinci Kanan District, Siak Regency, Riau	00° 25' 28.90" N	101° 50' 07.50" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Buatan Estate	2,377	27.78	217.22	2,622	90.66
KUD Bhakti Mandiri (278 members)	980	0	0	980	100
KUD Jaya Makmur (259 members)	920	0	0	920	100
KUD Sumber Rejeki (265 members)	820	0	0	820	100
KUD Sejahtera (295 members)	878	0	0	878	100
Total	5,975	27.78	217.22	6,220	97.41

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6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Buatan Estate	1,617	189	0	0	571	760	1,617
KUD Bhakti Mandiri	0	0	0	0	980	980	0
KUD Jaya Makmur	0	0	0	0	920	920	0
KUD Sumber Rejeki	0	0	0	0	820	820	0
KUD Sejahtera	0	0	0	0	878	878	0
Total (ha)	1,617	189	0	0	4,169	4,358	1,617

Note:

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Sept 2019 – Aug 2021)	Actual (Aug 2019 - Feb 2021)		Forecast (Sept 2021 – Aug 2022)
		Previous license period (Aug – Sept 2019)	Current license period (Oct 2019 – Feb 2021)	
Buatan Estate	22,936	3,758	7,612	18,144
KUD Bhakti Mandiri	23,620	3,398	20,468	26,805
KUD Jaya Makmur	22,432	3,467	2,2974	22,368
KUD Sumber Rejeki	20,283	3,050	2,2910	19,772
KUD Sejahtera	22,115	3,185	2,4942	19,339
Total	111,386*		115,765	106,428

Note: Volume extension since October 2019: FFB: 46,100 MT; CPO : 8,700 MT; PK : 2,500
 ** The volume does not include extended volume. The total volume included extension is 157,486MT

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (Sept 2019 – Aug 2021)	Actual (Aug 2019 - Feb 2021)		Forecast (Sept 2021 – Aug 2022)
	N/A	Previous license period	Current license period	N/A
N/A				
Total				

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9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (Sept 2019 – Aug 2021)	Actual (Aug 2019 - Feb 2021)		Forecast (Sept 2021– Aug 2022)
		Previous license period (Aug – Sept 2019)	Current license period (Oct 2019 – Feb 2021)	
Third Party Supplier	233,739 mt	40,842 mt	255,151 mt	214,811 mt
Note:				

10. Certified Tonnage					
Mill Capacity: 90 MT/hr	Estimated (Sept 2019 – Aug 2021)	Actual (Aug 2019 - Feb 2021)		Forecast (Sept 2021– Aug 2022)	
		Previous license period Aug 2019 – Sept 2019	Current license period Oct 2019 – Feb 2021		
		FFB	FFB		FFB
		111,386* mt	16,858 mt	98,907 mt	106,428 mt
			115,765 mt		
		CPO (OER: 19.30%)	CPO (OER: 18.37%)		CPO (OER:19.06 %)
		21,498** mt	3,270 mt	17,995 mt	20,284 mt
			21,265 mt		
		PK (KER: 5.20 %)	PK (KER: 5.28 %)		PK (KER: 5.35 %)
	5,792*** mt	891 mt	5,225 mt	5,694 mt	
		6,116 mt			
Note: Volume extension since October 2019: FFB: 46,100 MT; CPO : 8,700 MT; PK : 2,500 * The volume does not include extended volume. The total volume included extension is 157,486MT ** The volume does not include extended volume. The total volume included extension is 30,198MT *** The volume does not include extended volume. The total volume included extension is 8,292MT					

11. Actual Sold Volume (CPO)					
Current License period (Oct 2019 – Feb 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0	17,966.13	0	0	17,966.13
Previous License period (Aug 2019 – Sept 2019)					
CPO (MT)	0	3,247.06	0	0	3,247.06

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Total	0	21,213.19	0	0	21,213.19
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12. Actual Sold Volume (PK)					
Current License period (Oct 2019 – Feb 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	5,213.84	0	0	0	5,213.84
Previous License period (Aug 2019 – Sept 2019)					
PK (MT)	857.25	0	0	0	857.25
Total	6,071.09	0	0	0	6,071.09

13. Independent Smallholders Certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	-	-
IS-CSPKO	-	-
IS-CSPKE	-	-

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 84,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 1 – 5 March 2021. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on 20 – 21 July 2020.

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

The 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 & Criteria 2018, Indonesia National Interpretation 2020 for the Production of Sustainable Palm Oil was used to guide the assessment of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment. Stakeholder notification has been made on 9th February 2021 and uploaded in the RSPO website <https://www.rspo.org/certification/public-announcement>

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 (and smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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 Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Buatan Estate	X	X	X	X	X
KUD Bhakti Mandiri	X	X	X	X	-
KUD Jaya Makmur	-	X	-	X	X
KUD Sumber Rejeki	X	-	X	-	X
KUD Sejahtera	X	-	X	-	-

Tentative Date of Next Visit: May 9, 2022 - May 13, 2022

Total No. of Mandays: 24

2.2 BSI Assessment Team:

Team Member Name	Role	Qualifications
Mujinius Jalaraya	Team Leader	Holds Bachelor Degree in Forest Resources Conservation and Ecotourism from Faculty of Forestry, Bogor Agricultural University (IPB). He has working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk in 2008 - 2012 and as Sustainability Supervisor at Teladan Prima Group in 2012 – 2014. He had involved in RSPO certification since 2014 as a team member subsequently as a Lead Auditor. He has completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, RSPO endorsed P&C Lead Auditor course, RSPO endorsed SCCS Lead Auditor course, HCV Identification and management, ISO 14001 Internal Auditor course, ISO 45000 Lead Auditor course, Training for Trainers and OHS Expert Training. He is fluent in English and Bahasa Indonesia. During this audit, he assessed on the aspects of HCV management and monitoring, supply chain for mill, partial certification and timebound plan.

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Edy Widodo	Team member	<p>Holds a Bachelor Degree in Agriculture Tecknology from the Faculty of Agriculture, Department of Agricultural Technology, University of Padjadjaran, Bandung. His working experience includes as an Assistant Estates Manager with PT SMART Tbk. From 1999 to 2005. He has working experience in the industrial sector including handling of social aspect of the plantation and auditing Plantation, the processing industry and agricultural mechanization. He is Lead Auditor for ISO 9001: 2008 and an approved ISPO auditor by the ISPO Commission, Ministry of Agriculture of Indonesia on February 2013. He has completed Understanding ISO 14001: 2004 & Auditing ISO 14001: 2004 training, RSPO endorsed RSPO P&C Lead Auditor course, Rendorsed RSPO Supply Chain Certification lead auditor Course and SMETA Requirements Training. and. He is fluent in English and Bahasa Indonesia. During this audit, he assessed on the aspects of transparency, company policy, social and labor.</p>
Andi Pratama Pasaribu	Team member	<p>Holds a Bachelor Degree in Social Economy. He has morethan 5 years work experiences as the Plantation operational staff (Field assistant) since 2008 and auditing Sustainability Palm Oil scheme covering best management practices, land legality, environmental, social and worker welfare aspect and supply chain elements. He has completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor course held by the ISPO Commission, RSPO endorsed P&C Lead Auditor course by Proforest and Daemeter in 2016, High Conservation Value (HCV) Training, ISO 9001 Lead Auditor course, ISO 14001 Lead Auditor course, RSPO endorsed SCCS Lead Auditor course and OHSAS Auditor course. He is fluent in English and Bahasa Indonesia. During this audit, he verify legal aspect and best management practices aspect for mill and estate.</p>
Imam Fachrurozi	Team member	<p>Holds a Bachelor Degree in Agriculture Technology from Gadjah Mada University, Yogyakarta on 2011. He has 2 years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. He had been involved in sustainable palm oil auditing since 2015. He has completed ISO 9001:2008 and EMS 14001:2004 Lead Auditor course, SMK3 Lead Auditor course, RSPO endorsed P&C Lead auditor course. He is fluent in English and Bahasa Indonesia. During this audit, he assessed the aspects of OHS and Environmental management and monitoring.</p>
Dr Suhaili Sahari	Peer Reviewer	<p>Education:</p> <p>Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato’ Mohd Muda.</p> <p>Work Experience:</p> <p>Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more</p>

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	<p>than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. TS16949 3. Safety 4. ISO 14001:2015 Standard 5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4 7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS 8. HACCP MS 1480:2019 9. GAP Standard : Global GAP, Euru GAP
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Accompanying Persons: Nil

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2.3 Assessment Plan

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

Date	Time	Subjects	MJ	EW	IF	AP
Monday 01/03/2021	07.45 – 09.20	Flight Jakarta – Pekanbaru	√	√	√	√
	09.30 – 11.00	Travel from Pekanbaru to PT IIS – Buatan I	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 14.30	Opening Meeting Presentation by PT. IIS – Buatan I POM, Estate and Smallholder Presentation by BSI Indonesia	√	√	√	√
	14.30 – 17.00	Document Review Buatan I POM & Estate: - Occupational Health and Safety, HCV, Environment Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, Stakeholder Consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continous improvement, long term business plan.	√	√	√	√
Tuesday 02/03/2021	08.00 – 12.00	Field Visit to Buatan Estate: - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labour Union and Gender Committee.	√	√	√	√
	08.00 – 12.00	Stakeholder consultation: Local government of Pelalawan Regency (DLH, Disbun, Dinsakertrans & BPN), Village head, surrounding community, NGO.		√		
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Document Review for Buatan I Estate	√	√	√	√
Wednesday 03/03/2021	08.00 – 12.00	Document Review for Buatan I POM Field Visit to Buatan I POM: - Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS,	√	√	√	√

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		Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc. - Audit Supply Chain for CPO Mills (RSPO SCCS) - Interview workers.				
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Audit continue for Buatan I POM Document Review for Scheme Smallholder Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√
Thursday 04/03/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Sumber Rejeki Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (12 sample)	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Field Visit to Scheme Smallholder: KUD Jaya Makmur Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (12 sample)	√	√	√	√
Friday, 05/03/2021	08.00 – 12.00	Audit continue for Document Review Buatan I Estate, POM and Smallholder.	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 15.00	Audit Continue	√	√	√	√
	15.00 – 16.00	Report Preparation	√	√	√	√
	16.00 – 17.00	Closing Meeting	√	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- PT Inti Indosawit Subur Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Indonesia National Interpretation 2020 for RSPO P&C 2018
- Independent Smallholder Standard 2019

3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	<p>There is remaining mill and estate that has not certified as below:</p> <p>PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau. PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill and its supply bases. The unit has gone through the RSPO Stage 2 certification audit in 2014, however it was not succeed because there are plantings carried out after November 2005 and 2010 which must go through the NPP and RaCP processes completed prior to certification. The company’s sustainability team has conducted latest RSPO internal audit on December 2020. PT Mitra Unggul Pusaka will planned Re-Audit after RaCP process completed and concept note approved by RSPO, estimated in year 2022. Status of disclosure and NPP PT MUP has been submitted to RSPO by email since 29 November 2017. The latest email correspondences from RSPO dated 3 December 2020 confirmed that the concept note draft has been submitted by PT MUP, concept note were still under review by RSPO and there was a comments from RSPO to be followed up by company to improved for resubmission on clarity and precision of the content. PT MUP has reply the email by 6 May 2021 to RSPO for submission the revise of Concept Note and response for RSPO Comment; also attach the supporting document as part of Concept Note.</p> <p>2. Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Certification audit will be</p>	Complied

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	<p>planned on 2022. According to email correspondence with RSPO and PT NPK Bahilang Estate dated 26 July 2021, LUCA has been sent by company and acknowledge document receipt by RSPO, LUCA has been placed in the queue.</p> <p>3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed on 2022. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>4. Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planed on 2022. Latest updated July 2021, HGU still under process in Badan Pertanahan Nasional.</p>	
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.</p>	<p>No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available:</p> <ol style="list-style-type: none"> 1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau. RaCP still under process of concept note review by RSPO. Certification audit will be planed on 2022 2. Bahilang Estate (PT). RaCP still under Process. Certification audit will be planed on 2022. 3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed on 2022. 4. Teluk Panji Estate. HGU has not been obtained and still under process on government side. Certification audit will be planed on 2022. 	<p>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>There is no any isolated lapses in implementation of the plan. There are the changing on the plan due to the process of RaCP for PT Mitra Unggul Pusaka, Bahilang Estate and Sentral Estate and HGU issuance process for Teluk Panji Estate.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>There is no fundamental failure to proceed with implementation of the plan. Company has taken action to proceed all uncertified unit to complete the RaCP and to obtained the HGU for Teluk Panji Estate.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		

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<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation in PT Mitra Unggul Pusaka, cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <p>Latest progress of RaCP PT Mitra Unggul Pusaka based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.</p> <p>Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Certification audit will be planed on 2022. According to email correspondence with RSPO and PT NPK Bahilang Estate dated 26 July 2021, LUCA has been sent by company and acknowledge document receipt by RSPO, LUCA has been placed in the queue.</p> <p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed on 2022. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planed on 2022. Latest updated July 2021, HGU still under process in Badan Pertanahan Nasional.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>PT Mitra Unggul Pusaka – Segati Mill, PT NPK Bahilang Estate and Sentral Estate RaCP and relevant issues are still in progress and waiting for RSPO feedback. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantationin PT Mitra Unggul Pusaka, cacao plantation in Bahilang Estate and Sentral Estate no primary forest.</p> <p>Latest progress of RaCP PT Mitra Unggul Pusaka based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	<p>Complied</p>

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Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	According to internal audit result on December 2020, there is no Labor disputes occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	According to internal audit result on December 2020, there is no legal non compliance occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	PT Mitra Unggul Pusaka – Segati Mill conduct the internal audit each year. Latest internal audit on December 2020. Report of internal audit are available. Internal audit covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. Positive assurance by Internal Audit Dept. statement is available: There is no land conflict occur, no labor disputes occur, no legal non compliance, HCV monitoring and management well implemented. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	During internal audit December 2020, the stakeholder consultation including NGO cannot be done due to Pandemic Covid-19 circumstances. The stakeholder consultation will be conducted after the normal situation.	Complied

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

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? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Yes, PT Inti Indosawit Subur Group has including 100% the scheme smallholder in their certification.	Complied

3.4 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were 4 Critical nonconformities raised during the 30% remote audit.

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Non-conformity			
NCR Ref #	1937165-202007-M1	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 3.8.6 Critical
Date Issued	21 July 2020	Due Date	21 October 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	20 October 2020
Statement of Nonconformity:	Internal audit RSPO SCCS 2020 has been conducted on 2- 5 June 2020 by Internal Auditor, however the internal audit findings were not appropriate and the evidence of follow up action cannot be demonstrated.		
Requirement Reference:	Internal Audit i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.		
Objective Evidence:	PT. Inti Indosawit Subur – Buatan I POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7. Internal audit conducted twice a year. Latest internal audit has been conducted on 2- 5 June 2020 by Internal Auditor, internal audit report were evident, however the internal audit findings were regarding the shipping announcement of CPKO which is not related to mill instead KCP. In addition there is no evidence of correction and corrective action done to close the issue.		
Corrections:	Revision for internal audit report of RSPO SCCS has been made on 28 August 2020. Internal audit findings were adjust to Buatan I Palm Oil Mill and correct the typo error of KCP. Report amendment can be demonstrated during audit. Based on the results of the verification of the internal audit report, it can be shown that the report is appropriate and the checklist used was the latest audit checklist according to RSPO P&C 2018, INA NI 2020. Audit findings, rootcause analysis, correction and corrective action and its evidence can be shown in the report of internal audit.		
Root Cause Analysis:	Lack of understanding of the internal auditor team regarding the latest audit checklist used for internal audit of the RSPO SCCS Buatan I POM.		
Corrective Actions:	Internal Audit Manager has carried out the refreshment training for internal audit team on 11 September 2020 by online training. Evidence of training can be demonstrated as per Zoom Meeting record dated 11 September 2020. Training material and minutes of training are available and verified.		

	Internal audit department has made the improvement plan to address the internal audit issue and to enhance the internal audit performance. Improvement plan present as per "IMPROVEMENT PLAN INTERNAL AUDIT RSPO SCCS Tahun 2020". Improvement plan are including: Refreshment training plan, Internal audit procedure review, Pilot project of internal audit improvement process, review the external audit as the reference.
Assessment Conclusion:	PT Inti Indosawit Subur – Buatan I POM has performing the correction and corrective action as above. Auditor has verify all the evidence document to fullfill the internal audit RSPO, including RSPO SCCS as per Procedure. Internal audit department has made the improvement plan to address the internal audit issue and to enhance the internal audit performance. The NC has closed satisfactory on 20 October 2020. The NC Closure conducted by remotely due to due to the COVID-19 pandemic and the travel restrictions.

Non-conformity			
NCR Ref #	1937165-202007-M2	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 3.8.16 Critical
Date Issued	21 July 2020	Due Date	21 October 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	20 October 2020
Statement of Nonconformity:	<p>According to transaction record in Palmtrace confirmed that there were 2 transaction record with shipping announcement in the RSPO IT Platform made more than 3 month after Bill of Lading, i.e:</p> <ul style="list-style-type: none"> - BL date CSPK to Buatan I KCP dated 29/02/2020, volume 59.39 MT, Shipping announcement was made on 09/07/2020 - BL date CSPK to Buatan I KCP dated 31/03/2020, volume 449.66 MT, Shipping announcement was made on 09/07/2020 		
Requirement Reference:	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>		
Objective Evidence:	<p>According to transaction record in Palmtrace Buatan I POM confirmed that there were 2 transaction record with shipping announcement in the RSPO IT Platform made more than 3 month after Bill of Lading, i.e:</p> <ul style="list-style-type: none"> - BL date CSPK to Buatan I KCP dated 29/02/2020, volume 59.39 MT, Shipping announcement was made on 09/07/2020 - BL date CSPK to Buatan I KCP dated 31/03/2020, volume 449.66 MT, Shipping announcement was made on 09/07/2020 		

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Corrections:	<p>Buatan I POM has made an update and internal coordination regarding the implementation of RSPO SCCS standards for Palm Oil Mill that the shipping announcement must be made a maximum of 3 months after the delivery transaction/BL date is made. Internal coordination between sustainability department, purchasing and palm Oil Mill unit can be demonstrated through email correspondence.</p> <p>Shipping announcements after July 2020 are made maximum of 3 months after the transaction. The following is an example of the shipping announcement that has been made for CSPK:</p> <ul style="list-style-type: none"> Transaction ID # TR-a1c7c1e9-e39b, Product name: CSPK, Seller: PT Inti Indosawit Subur - Buatan I (RSPO_PO100000021), Buyer: PT Inti Indosawit Subur - Buatan I KCP (RSPO_PO1000002758), Shipping/BL Date: 31/08/2020, Confirmation Date (Shipping announcement): 21/10/2020, Volume: 219.44 MT. Transaction ID # TR-d22fc925-2e72, Product name: CSPK, Seller: PT Inti Indosawit Subur - Buatan I (RSPO_PO100000021), Buyer: PT Inti Indosawit Subur - Buatan I KCP (RSPO_PO1000002758), Shipping/BL Date: 31/07/2020, Confirmation Date (Shipping announcement): 21/10/2020, Volume: 393.46 MT. <p>From above shipping announcement can be demonstrated that Shipping announcement are made not more than 3 month after shipping/BL date.</p>
Root Cause Analysis:	<p>PICs that make the shipping announcement do not update regarding the latest RSPO SCCS requirements for Palm Oil Mill that the PKS shipping announcement must be made a maximum of 3 months after dispatch/Bill of Lading date.</p>
Corrective Actions:	<p>Certificate holder has made the form of monitoring indicated the CSPK produce and delivery by Buatan I POM to buyer (KCP or other party). Monitoring of CSPK production and delivery are made each month as a reference for the shipping announcements made by PIC (Jakarta Office). Monitoring form since July 2020 - October 2020 can be demonstrated during audit.</p> <p>Shipping announcements are made based on SOP AA-SM-405.2-R3.</p> <p>From the July - October period it was confirmed that there were no RSPO certified CPO sales and only RSPO certified PK sales.</p>
Assessment Conclusion:	<p>PT Inti Indosawit Subur – Buatan I POM has performing the correction and corrective action as above. Auditor has verify all the evidence document to fullfill the Shipping announcements are made based on SOP AA-SM-405.2-R3. Shipping announcements after July 2020 are made maximum of 3 months after the transaction.</p> <p>The NC has closed satisfactory on 20 October 2020.</p> <p>The NC Closure conducted by remotely due to due to the COVID-19 pandemic and the travel restrictions.</p>

Non-conformity			
NCR Ref #	1937165-202007-M3	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 6.6.2 Critical

Date Issued	21 July 2020	Due Date	21 October 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	20 October 2020
Statement of Nonconformity:	PT IIS - Buatan I POM employed temporary workers/PHL for their operation, however there is no specific procedures and policies related to temporary workers/PHL (Perjanjian Kerja Waktu Tertentu/PKWT).		
Requirement Reference:	(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.		
Objective Evidence:	<p>PT Inti Indosawit Subur – Buatan I POM uses temporary workers as PHL at Buatan I Estate, Plasma and Buatan I POM operations. Based on employee list period May 2020, there are 268 PHL workers in Buatan I Estate, 3 PHL workers in Plasma Buatan I and 19 PHL workers in Buatan I POM.</p> <p>The company has a procedure regarding SOP No. New Employee Reception AA-HR-305.2-R0 dated 1 February 2009, this procedure is a general acceptance of employees (for all employees), there are no specific procedures and policies regarding BHL or PKWT workers according to the RSPO P&C requirements.</p>		
Corrections:	<p>PT Inti Indosawit Subur – Buatan I POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below:</p> <ul style="list-style-type: none"> - Buatan I POM: Memorandum No. 157/MI-PBS/VIII/2020, dated 11 August 2020. - Buatan Estate: Memorandum No. 391/ES-KBN/MEMO/08/2020, dated 11 August 2020. <p>The policy and procedure has been communicated to workers, especially to temporary workers at Buatan I POM on 22 August 2020, while in Buatan Estate socialization conducted on 15 August 2020 to workers of Afdeling I - III, Traksi and administration. The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p>		
Root Cause Analysis:	There has been no coordination between the sustainability department and the HR department in adjusting for updates/changes to the implementation of the RSPO INA NI 2020 principles and criteria, including updating procedures for PHL/PKWT.		
Corrective Actions:	PT Inti Indosawit Subur - Buatan I POM & Estate will review the policy and procedure including the implementation of procedure periodically in coordination with Human resources Department. Sustainability team has made the coordination with HR department and Estate/Mill department to keep updated the policy and procedure according to relevant regulation.		
Assessment Conclusion:	PT Inti Indosawit Subur – Buatan I POM has performing the correction and corrective action as above. Auditor has verify all the evidence document to fulfill the procedures and policies related to temporary workers/PHL. Company has issued the specific labour policy and procedures for temporary workers (PHL/PKWT) and disseminated to all workers.		

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	<p>The NC has closed satisfactory on 20 October 2020.</p> <p>The NC Closure conducted by remotely due to due to the COVID-19 pandemic and the travel restrictions.</p>
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Non-conformity			
NCR Ref #	1937165-202007-M4	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 7.10.1 Critical
Date Issued	21 July 2020	Due Date	21 October 2020
Closed (Yes / No)	No	Date of nonconformity Closure	20 October 2020
Statement of Nonconformity:	<p>Buatan I POM has monitored the emission and pollutants from estate and mill operation using PalmGHG Version 4. However, it was found that information used for GHG calculation in Buatan I POM using PalmGHG Version 4, was not accurate – compared against the estate and mill operational database.</p>		
Requirement Reference:	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>		
Objective Evidence:	<p>Audit team was found that the calculation for Buatan I POM, using PalmGHG Version 4 was not accurate – compared against the estate and mill operational database.</p> <p>Example of database seen:</p> <ul style="list-style-type: none"> - From PalmGHG version 4 => the figure for FFB supplied from Buatan Estate was stated 22,280 tons – whereby the planted hectareage of 1,953.33 Ha resulting in yield 11,41 ton FFB/Ha/year. The database (LHP) shown the FFB figure from Buatan Estate (supplying to Buatan I POM) were 19,733.12 tons. - The figure for FFB supplied from 3rd party stated 196,847 tons. The data provided shown the FFB figure from 3rd party (supplying to Buatan I POM) was 199,393.331 tons; 		
Corrections:	<p>The company has revised the GHG data input by adjusting the actual data reported by Buatan I POM and Estate. GHG Calculation amendment can be demonstrated during audit as per "GHG Summary Report 2020 PT INTi Indosawit Subur - Buatan I POM". Based on verification data of data input GHG compare to actual data reported by Buatan I POM and Estate confirmed that the data input in GHG calculation are met and inline with actual data of Buatan I POM and Estate. Input data verify covering: FFB production (own, group & third party), CPO & PK production, OER, KER, PK Shell production and sales, POME production, EFB p[roduction, Fertilizer usage (own & group plantation), Planted area (own and group), Conservation area, Fossil fuel usage, Grid electricity, etc.</p> <p>According to GHG summary report, GHG summary emission are: 0.26 tCO2 e/t CPO and 0.26 tCO2 e/t PK.</p>		
Root Cause Analysis:	<p>Lack of coordination between the Mill and Estate units in terms of providing raw data with the Jakarta Office that performs GHG calculations.</p>		

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Corrective Actions:	The Jakarta office (JRO) coordinates with Buatan I POM & Estate units in terms of providing raw data for input on GHG calculations. Before calculating, JRO cross-checks and verifies the mill and plantation units documented in the "GHG RSPO Sheet". In this form, it is reconfirmed the suitability of the GHG data input with the actual data from the mill and estate reports. GHG RSPO sheet can be demonstrated during audit verification.
Assessment Conclusion:	PT Inti Indosawit Subur – Buatan I POM has performing the correction and corrective action as above. Auditor has verify all the evidence document to fullfill the GHG calculations using PalmGHG Version 4. Company has revised the GHG data input by adjusting the actual data reported by Buatan I POM and Estate, the GHG calculation found accurately calculated. The NC has closed satisfactory on 20 October 2020. The NC Closure conducted by remotely due to due to the COVID-19 pandemic and the travel restrictions.

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1798070-201906-M1	Clause & Category (Critical / Minor)	RSPO P&C INA-NI 2016; Indicator 1.2.1 - Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	29 August 2019
Statement of Nonconformity:	Based on verification documents and interview, it found that determination of type of documents that are publicly accessible is not in accordance with the require of P & C RSPO 1.2.1.		
Requirement Reference:	Publicly available documents shall include, but are not necessarily limited to: 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)		

	<ul style="list-style-type: none"> 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).
Objective Evidence:	<p>Based on documents of "Daftar Dokumen dan Informasi untuk Diakses Publik" which update on 17 July 2018, its state that several documents can not be access by public/society" as required, such as:</p> <ul style="list-style-type: none"> - Amdal, - Land titles/user rights - Identification of HCV and Reporting document - Conservation management plan document - Details of complaints and grievances <p>There is no describe that information would result in negative environmental or social outcomes.</p>
Corrections:	<p>Coordination between PT IIS Buatan I POM with Sustainability Dept and ESL to revised the list of publicly available document as per RSPO requirement.</p> <p>Management unit PT IIS Buatan I POM has made coordination with Sustainability Dept and ESL dept to release the list of publicly available document as per RSPO requirement indicator 1.2.1.</p> <p>Document present in "Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosawit Subur" dated 2 August 2019. In the list of document consist of 32 type of document that can be accessed by stakeholder/public (government, community/society, NGO and cooperative/KUD).</p>
Root Cause Analysis:	<p>Management unit PT IIS Buatan I POM has not coordination with Sustainability Dept and ESL regarding the issuance/publication of "List of Document and Information that can be accessed by Public".</p>
Corrective Actions:	<p>Management unit PT IIS Buatan I POM has made coordination with Sustainability Dept and ESL dept to release the list of publicly available document as per RSPO requirement indicator 1.2.1.</p> <p>Document present in "Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosawit Subur" dated 2 August 2019. In the list of document consist of 32 type of document that can be accessed by stakeholder/public (government, community/society, NGO and cooperative/KUD). List of document has cover:</p> <ul style="list-style-type: none"> a) Land titles/user rights (Izin Lokasi, Izin Prinsip, IPKH, Sertifikat HGU) b) Occupational health and safety plans (Laporan Pelaksanaan P2K3) c) Plans and impact assessments relating to environmental and social impacts (AMDAL, SIA, Laporan RKL-RPL) d) HCV documentation (Laporan Identifikasi HCV) e) Pollution prevention and reduction plans (Program Manajemen Lingkungan) f) Details of complaints and grievances (SOP Sosial, Rekaman keluhan dan Komplain Stakeholder)

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	<p>g) Negotiation procedures (SOP Sosial, penanganan informasi, keluhan dan konflik)</p> <p>h) Continual improvement plans (Continuous improvement program)</p> <p>i) Public summary of certification assessment report (Public Summary Report RSPO dari LS)</p> <p>j) Human Rights Policy (Kebijakan Perusahaan).</p>
Assessment Conclusion:	<p>During audit Recertification audit team has verify the Publicly available documents "Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosawit Subur" dated 2 August 2019. In the list of document consist of 32 type of document that can be accessed by stakeholder/public (government, community/society, NGO and cooperative/KUD).</p> <p>The NC remain closed and no other issue regarding the Publicly available documents.</p>

Non-conformity			
NCR Ref #	1798070-201906-M2	Clause & Category (Critical / Minor)	RSPO P&C INA-NI 2016; Indicator 4.8.1 - Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	29 August 2019
Statement of Nonconformity:	There was found inconsistency between monitoring of training as per documented "Rencana dan Realisasi Pelatihan Bulanan tahun 2018 Kebun Plasma Buatan and the training realization records (attendance list and training material).		
Requirement Reference:	Records of training program related to the aspects of RSPO Principles and Criteria shall be available.		
Objective Evidence:	Monitoring of Training as per documented "Rencana dan Realisasi Pelatihan Bulanan tahun 2018 Kebun Plasma Buatan" has reported that training of PPE uses has planned in 30 October 2018 and the realization has carried out on 30 October 2018, however other records of Training stated that the realization was on 7 April 2018 in KUD Sejahtera, 16 April 2018 in KUD Sumber Rejeki.		
Corrections:	<p>Management unit Plasma Buatan I POM has revise and justify the title of Training Program 2018 "Pelatihan Panen dan Potong Buah" to become "Penyuluhan Cara Penggunaan APD dan Panen" according to the actual realization of training. The training is covering the best practices of harvesting and OHS aspect of harvesting particularly in best practice of PPE usage during harvest. The training planed and realization in October 2018, record of training program and realization were available.</p> <p>While training program for "Pelatihan APD (Basic Safety & K3)" has justify to "Penyuluhan Basic Fire, K3 dan HCV" according to record of training realization. The training planed and realization in April 2018 for KUD Sejahtera and KUD Sumber Rezeki. Record of training program and realization were available.</p>		
Root Cause Analysis:	Administration mistaken in the title of training record and training realization in the form of "Minutes training" compare to the title of training program. The training program title 2018 was "Pelatihan Panen dan Potong Buah" while in the minutes of training record the title was "Penyuluhan Cara Penggunaan APD dan Panen"		

	Planned and realization in April 2018 for KUD Sejahtera; another training program title was "Pelatihan APD (Basic Safety & K3)" while the record of training title was "Penyuluhan Basic Fire, K3 dan HCV" planned and realization in October 2018.
Corrective Actions:	<p>Review the training program regularly and carried out the implementation of training program. Management unit Plasama Buatan I has made the training program 2019. Training realization 2019 has met with the training program, sample seen:</p> <ul style="list-style-type: none"> - Training program "Penyuluhan Cara Panen dan Penggunaan APD" planned in January 2019, record of training were available in minutes training of - "Penyuluhan Cara Panen dan Pemakaian APD", the training was held on 19 January 2019 in KUD Sejahtera. - Training program "Penyuluhan Pestisida Terbatas dan K" planned in June 2019, record of training were available in minutes training of "Penyuluhan Pestisida Terbatas dan K3", the training was held on 25 June 2019 in Gedung Serba Guna Desa Makmur SP6, the participant is all official of KUD.
Assessment Conclusion:	<p>During audit Recertification audit team has verify The training planned and realization in October 2020, record of training program and realization were appropriately and consistently available. According to the evidence provided and field verification, the corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.</p> <p>During Re-certification audit, auditor conclude that the Major NC regarding the training are remain closed and effectively maintained.</p>

Non-conformity			
NCR Ref #	1798070-201906-M3	Clause & Category (Critical / Minor)	RSPO P & C INA NI 2016, Indicator 4.7.3 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	29 August 2019
Statement of Nonconformity:	Implementation of PPE usage in smallholders was not in accordance with HIRAC and SOP Group Certification.		
Requirement Reference:	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 workers.		
Objective Evidence:	<p>Based on field observation and interview of sample smallholders at KUD Bakti Mandiri:</p> <ul style="list-style-type: none"> • Plot No. 687 Farmer Group 29: Harvester did not use PPE (helmet and rubber boot) as required during harvesting. This is not comply with HIRAC (update 5 Jan 2019) and SOP Group Certification (SK SOP PT. IIS-Kebun Plasma Buatan No.020 / DOK / SOP / PT.IIS-ICS KLB/2017, dated 2 Jan 2017). • Plot No. 665 Farmer Group 29: Harvester provide PPE by themselves. 		
Corrections:	<ul style="list-style-type: none"> - Management Plasma Buatan I POM has taken action by issued the warning letter to the harvester as the waning due to the violation of OHS regulation. Warning letter issued for Solikin, dated 5 July 2019, Solikin also made the 		

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	<p>recognizing and statement letter to obey the OSH regulation and not to repeat the violation.</p> <ul style="list-style-type: none"> - Company also has socialize and give the awareness to all the harvester regarding the OSH regulation and awareness of health and safety including the discipline of PPE usage during harvest. Socialization was held on 5 July 2019 in KUD Bhakti Mandiri. - Awareness program also has been planed once a year in the training program 2019, the awareness for PPE usage has been delivered on 16 January 2019 and attend by 24 harvester and field foreman. - The PPE for harvester has been provided by Plasma Buatan I to all harvester (safety helmet and rubber boots). Evidence of PPE provision can be demonstrated during audit. - Plasma Buatan I also has made the monitoring checklit for harvester PPE usage to ensure the discipline of PPE usage by harvester. Record of monitoring present in "Check list monitoring APD Pemanen Kebun Plasma Buatan". Sample seen: "Check list monitoring APD Pemanen Kebun Plasma Buatan" period July and August 2019, dated 5 July, 15 July, 5 August and 15 August 2019.
<p>Root Cause Analysis:</p>	<p>Lack of discipline from harvester to use the PPE during harvest and lack of monitoring from field foreman.</p>
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> - Regular monitoring by field foreman and assistant to ensure the PPE usage by harvester. - Company also has socialize and give the awareness to all the harvester regarding the OSH regulation and awareness of health and safety including the discipline of PPE usage during harvest. Socialization was held on 5 July 2019 in KUD Bhakti Mandiri. - Awareness program also has been planed once a year in the training program 2019, the awareness for PPE usage has been delivered on 16 January 2019 and attend by 24 harvester and field foreman. - Plasma Buatan I also has made the monitoring checklit for harvester PPE usage to ensure the discipline of PPE usage by harvester. Record of monitoring present in "Check list monitoring APD Pemanen Kebun Plasma Buatan". Sample seen: "Check list monitoring APD Pemanen Kebun Plasma Buatan" period July and August 2019, dated 5 July, 15 July, 5 August and 15 August 2019.
<p>Assessment Conclusion:</p>	<p>During audit Recertification audit team has verify Management unit Plasma Buatan I POM has provide PPE for all harvester (safety helmet and boots). Plasma Buatan I also has made the monitoring checklit for harvester PPE usage to ensure the discipline of PPE usage by harvester. According to the evidence provided and field verification, the corrective action made is effectively implemented.. Therefore, auditor concludes this Non-Conformity is Closed.</p> <p>During Re-certification audit, auditor conclude that the Major NC regarding the training are remain closed and effectively maintained.</p>

Non-conformity

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NCR Ref #	1798070-201906-M4	Clause & Category (Critical / Minor)	RSPO P & C INA NI 2016, Indicator 5.5.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	29 August 2019
Statement of Nonconformity:	PT. Inti Indosawit Subur - Buatan I POM cannot demonstrate there is control over outsourced transporter.		
Requirement Reference:	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ul style="list-style-type: none"> • 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. • The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 		
Objective Evidence:	<p>PT. Inti Indosawit Subur - Buatan I POM cannot demonstrate there is control upon outsourcing transporter:</p> <p>a) PT. Inti Indosawit Subur cannot demonstrate 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>b) PT. Inti Indosawit Subur cannot demonstrate control system and communicated the outsourced transport contractor.</p>		
Corrections:	<ul style="list-style-type: none"> • PT IIS Buatan I POM has made the new agreement contract with transporter in: <ol style="list-style-type: none"> 1. "Perjanjian Pengangkutan Nomor: 05/VIII/JB-IIS/2019 CV Jasa Bersama and PT Inti Indosawit Subur" dated 2 August 2019. 2. "Perjanjian Pengangkutan Nomor: 06/VIII/WMPL-IIS/2019 PT Wijaya Multi Prima Lestari and PT Inti Indosawit Subur" dated 2 August 2019. 3. "Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019 PT Buana Jaya Bersama and PT Inti Indosawit Subur" dated 2 August 2019. <p>The contract agreement has covered:</p> <ul style="list-style-type: none"> ✓ Outsourced process with transporter including right and responsibility between two parties, ✓ Transporter is committed to comply with RSPO SCCS standard and following the regulation ✓ Transporter is willing to be audited by Certification Body as necessary concerning on RSPO SCCS. <p>Agreement contract has been signed by two parties both PT Inti Indosawit Subur – Buatan I POM (on behalf PT Inti Indosawit Subur Group) and transporter.</p> 		

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	<p>Transporter also has signed the statement letter which declared that they commit to comply to RSPO SCCS requirement during transporting RSPO certified raw material and they allow the certification body and/or RSPO auditor to conduct the audit to they company and operation.</p> <ul style="list-style-type: none"> • PT IIS Buatan I POM has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R6 dated 1 September 2017" Internal control for CPO and PK delivery by contractor has made as well by: <ul style="list-style-type: none"> ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time\ ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. ✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of segel.
<p>Root Cause Analysis:</p>	<p>PT IIS Buatan I POM deemed that "Surat Perintah Kerja (SPK)" for transporter is the contract, however SPK is not covering the agreement between two parties and not signed by transporter and only by PT IIS – Buatan I POM.</p>
<p>Corrective Actions:</p>	<p>PT Inti Indosawit Subur – Buatan I POM Conduct the internal audit regularly and include the transporter/outsourc process in the internal audit checklist.</p> <p>PT. Inti Indosawit Subur – Buatan I POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. The latest internal audit 2019 conducted on 9 – 11 December 2019 by Mr. Hendrik Simanjuntak, Wahyu, Ridho Ilahi, Ian Septian Arifin. Internal audit 2020 planed on June and December 2020. Semester I 2020 internal audit SCCS has been conducted on 5 – 6 June 2020 by Hendrik Simanjuntak.</p> <p>Internal audit report were evident, all issue raised during internal audit has been followed up by Corrective Action and Closed. Sample seen on internal audit issue December 2019: There is no Shipping Announcement made for several transaction; Buatan I POM has follow up by coordination with marketing division to complete the sipping announcement; There is no issue of nonconformity raised during internal audit June 2020.</p>
<p>Assessment Conclusion:</p>	<p>During audit Recertification audit team has verify the internal audit procedure and implementation according to AA-MPM-OP-1400.17-R7. Internal audit 2020 planed on June and December 2020. Semester I 2020 internal audit SCCS has been conducted on 5 – 6 June 2020 by Hendrik Simanjuntak. Internal audit report were evident, all issue raised during internal audit has been followed up by Corrective Action and Closed.</p> <p>According to the evidence provided and field verification, the corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.</p>

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	During Re-certification audit, auditor conclude that the Major NC are remain closed and effectively maintained.
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Non-conformity			
NCR Ref #	1798070-201906-M5	Clause & Category (Critical / Minor)	RSPO P & C INA NI 2016, Indicator 5.7.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	29 August 2019
Statement of Nonconformity:	PT. Inti Indosawit Subur – Buatan I POM sold RSPO certified CSPO into ISCC, however, there was no evident of removal from their PalmTrace account.		
Requirement Reference:	The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <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. 		
Objective Evidence:	PT. Inti Indosawit Subur – Buatan I POM sold RSPO certified CSPO into ISCC, however, there was no evident of removal from their PalmTrace account.		
Corrections:	<p>Company has send the email to Palm oil Support UTZ on 12 August 2019 to ask the histories log transaction (remove stock) that cannot appear at the Buatan I POM Palm Trace Account. The Palm Oil Support UTZ (Vincent Michael) has reply the email and confirmed that there was seem to be a glitch in the system, they have reported to they concerned team and try to fix accordingly.</p> <p>PT IIS Buatan I POM has remove all the CPO and PK sold as ISCC certified accordingly as much as:</p> <ul style="list-style-type: none"> - CSPK: certified volume (6,024 MT), volume removed (3,270.01 MT), remaining volume (2,753.99 MT) - CSPO: certified volume (23,008 MT), volume removed (16,985.17 MT), remaining volume (6,022.83 MT) <p>During audit, email record from Palm Oil Support UTZ and the log of transaction can be demonstrated.</p>		
Root Cause Analysis:	There is an error of the Palm trace system and it was confirmed by UTZ. Actually PT IIS Buatan I POM has perform the remove for CPO/PK sold as other certified scheme (ISCC), however the log history of remove transaction in the Palm trace were not available.		
Corrective Actions:	<p>Buatan I POM Performing the removal stock if there was a CPO/PK sold as another certified scheme and keep the log histories of remove transaction and confirmation to Palm Oil Support UTZ if there is any issue regarding the palmtrace transaction.</p> <p>Buatan I POM has demonstrated the email to Palm oil Support UTZ on 12 August 2019 to ask the histories log transaction (remove stock) that cannot appear at the Buatan I POM Palm Trace Account. The Palm Oil Support UTZ (Vincent Michael) has reply the email and confirmed that there was seem to be a glitch in the system, they have reported to they concerned team and try to fix accordingly.</p>		

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Assessment Conclusion:	<p>During audit Recertification audit team has verify the remove transaction on Palmtrace.</p> <p>PT. Inti Indosawit Subur – Buatan I POM made remove RSPO certified CSPO from their PalmTrace account with volume remove: 15,532.92 MT CSPO; Stock removed for CSPO sold as ISCC certified. The evidence of remove transaction can be demonstrated on the palmtrace transaction during audit.</p> <p>According to the evidence provided and field verification, the corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.</p> <p>During Re-certification audit, auditor conclude that the Major NC are remain closed and effectively maintained.</p>
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Non-conformity			
NCR Ref #	1798070-201906-N1	Clause & Category (Critical / Minor)	RSPO P & C INA NI 2016, Indicator 2.2.2 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	21 July 2020
Statement of Nonconformity:	Legal boundaries at smallholders plot are not demonstrated clearly and maintained properly.		
Requirement Reference:	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.		
Objective Evidence:	<p>Legal boundaries are demonstrated clearly and maintained.</p> <p>Based on field observation of sample smallholders at</p> <ul style="list-style-type: none"> • Plot No. 645, Farmer Group 29 KUD Bakti Mandiri, • Plot No. 1567, Farmer Group 97, KUD Jaya Makmur • Plot No. 1584, Farmer Group 97, KUD Jaya Makmur • Plot No. 2409, Farmer Group 74, KUD Sejahtera • Plot No. 2449, Farmer Group 74, KUD Sejahtera <p>it was clearly observe that 2 of 4 legal boundaries did not found on the ground during visit.</p>		
Corrections:	<p>Identify the kavling boundary poles and replace the losing poles in the smallholder kavling</p> <p>Prepare the kavling boundary poles.</p>		
Root Cause Analysis:	Mandor (foreman) has not aware the exactly position of kavling boundary poles.		
Corrective Actions:	<p>Regular monitoring the kavling boundary poles and record the polse identification as well as maintain the boundary poles.</p> <p>Monitoring of boundary poles has been caried out each month by Mandor (foreman). Latest monitoring on June 2020, record of monitoring were evident. Plasma management also has socialize and give awareness to mandor (foreman) regarding poles maintenance and monitoring. The socialization attended by 17 participants from Plasma Staff (including Mandor) and KUD’s representatives’ staff.</p>		

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Assessment Conclusion:	Buatan I Plasma has demonstrated boundary poles identification and socialization of boundary poles maintenance and monitoring. According to the evidence provided and verification, the corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.
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Non-conformity			
NCR Ref #	1798070-201906-N2	Clause & Category (Critical / Minor)	RSPO P & C INA NI 2016, Indicator 4.8.2 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	21 July 2020
Statement of Nonconformity:	Group Manager cannot demonstrated the record of training for sampled employee.		
Requirement Reference:	Records of training for each employee shall be maintained.		
Objective Evidence:	Group Manager cannot demonstrated the record of training for sampled employee, e.g: in KUD Sumber Rejeki -> employee name: Mr. Sondang (harvester), Mr. Karno (harvester) and in KUD Sejahtera -> employee name: Mr. Subakti (harvester) and Mr. Wandu (harvester).		
Corrections:	Kept the record of training for each member who has follow the training delivered by Plasma management.		
Root Cause Analysis:	Training has been done for smallholder however Plasma management has not been kept the record training for each smallholder due to the thousand of member of smallholder.		
Corrective Actions:	Regular monitoring the training implementation and record for smallholder member. Record of training monitoring was kept at ICS office and evident during audit.		
Assessment Conclusion:	Buatan I Plasma has demonstrated record of training for each member who has follow the training delivered by Plasma management. According to the evidence provided and verification, the corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.		

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1222271M1 – 4.7.3	Major	RSPO P&C Generic 2013 Indicator 4.7.3	08/01/2015	Closed 09/01/2015

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1222271N1 – 4.7.5	Minor	RSPO P&C Generic 2013 Indicator 4.7.5	08/01/2015	Closed 07/30/2016
1222271N2 – 4.8.2	Minor	RSPO P&C Generic 2013 Indicator 4.8.2	08/01/2015	Closed 07/30/2016
1357969M1 – 4.6.5	Major	RSPO P&C Generic 2013 Indicator 4.6.5	07/30/2016	Closed 09/06/2016
1357969M2 – 4.7.1	Major	RSPO P&C Generic 2013 Indicator 4.7.1	07/30/2016	Closed 09/06/2016
1357969M3 – 4.7.3	Major	RSPO P&C Generic 2013 Indicator 4.7.3	07/30/2016	Closed 09/06/2016
1357969N1 – 4.6.10	Minor	RSPO P&C Generic 2013 Indicator 4.6.10	07/30/2016	Open, Escalated to Major NC 1514963-201708-M4
1357969N2 – 4.7.6	Minor	RSPO P&C Generic 2013 Indicator 4.7.6	07/30/2016	Open, Escalated to Major NC 1514963-201708-M6
1357969N3 – 5.1.3	Minor	RSPO P&C Generic 2013 Indicator 5.1.3	07/30/2016	Closed on 12 August 2017
1357969N4 – 5.6.3	Minor	RSPO P&C Generic 2013 Indicator 5.6.3	07/30/2016	Open, Escalated to Major NC 1514963-201708-M9
1514963-201708-M1	Major	RSPO P&C INA-NI 2016 indicator 2.1.1	12/08/2017	Closed 09/10/2017
1514963-201708-M2	Major	RSPO P&C INA-NI 2016 indicator 4.1.2	12/08/2017	Closed 09/10/2017
1514963-201708-M3	Major	RSPO P&C INA-NI 2016 indicator 4.3.4	12/08/2017	Closed 10/10/2017
1514963-201708-M4	Major	RSPO P&C INA-NI 2016 indicator 4.6.10	12/08/2017	Closed 10/10/2017
1514963-201708-M5	Major	RSPO P&C INA-NI 2016 indicator 4.7.2	12/08/2017	Closed 10/10/2017
1514963-201708-M6	Major	RSPO P&C INA-NI 2016 indicator 4.7.6	12/08/2017	Closed 10/10/2017
1514963-201708-M7	Major	RSPO P&C INA-NI 2016 indicator 4.8.1	12/08/2017	Closed 10/10/2017
1514963-201708-M8	Major	RSPO P&C INA-NI 2016 indicator 5.3.2	12/08/2017	Closed 10/10/2017
1514963-201708-M9	Major	RSPO P&C INA-NI 2016 indicator 5.6.3	12/08/2017	Closed 10/10/2017
1514963-201708-M10	Major	RSPO P&C INA-NI 2016 indicator 6.1.3	12/08/2017	Closed 09/10/2017
1514963-201708-M11	Major	RSPO P&C INA-NI 2016 indicator 6.5.2	12/08/2017	Closed 09/10/2017

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1514963-201708-M12	Major	RSPO P&C INA-NI 2016 indicator 6.9.1	12/08/2017	Closed 09/10/2017
1514963-201708-M13	Major	RSPO SCC Module E: E.4.1	12/08/2017	Closed 09/10/2017
1514963-201708-N1	Minor	RSPO P&C INA-NI 2016 indicator 4.3.5	12/08/2017	Closed 13/08/2018
1514963-201708-N2	Minor	RSPO P&C INA-NI 2016 indicator 6.1.4	12/08/2017	Closed 13/08/2018
1514963-201708-N3	Minor	RSPO P&C INA-NI 2016 indicator 6.5.3	12/08/2017	Closed 13/08/2018
1670895-201808-M1	Major	RSPO SCC General Chain of Custody 5.3.2	13/08/2018	Closed 03/10/2018
1670895-201808-M2	Major	RSPO P&C INA-NI 2016 indicator 8.1.1	13/08/2018	Closed 03/10/2018
1670895-201808-N1	Minor	RSPO P&C 4.4.4	13/08/2018	Closed 01/07/2019
798070-201906-M1	Major	RSPO P&C INA-NI 2016 indicator 1.2.1	04/07/2019	Closed 29/08/2019
798070-201906-M2	Major	RSPO P&C INA-NI 2016 indicator 4.8.1	04/07/2019	Closed 29/08/2019
798070-201906-M3	Major	RSPO P&C INA-NI 2016 indicator 4.7.3	04/07/2019	Closed 29/08/2019
798070-201906-M4	Major	RSPO SCC General Chain of Custody 5.5.2	04/07/2019	Closed 29/08/2019
798070-201906-M5	Major	RSPO SCC General Chain of Custody 5.7.2	04/07/2019	Closed 29/08/2019
798070-201906-N1	Minor	RSPO P&C INA-NI 2016 indicator 2.2.2	04/07/2019	Closed 21/07/2020
798070-201906-N2	Minor	RSPO P&C INA-NI 2016 indicator 4.8.2	04/07/2019	Closed 29/07/2020
1937165-202007-M1	Major	RSPO P&C INA-NI 2020 indicator 3.8.6	21/07/2020	Closed 20/10/2020
1937165-202007-M2	Major	RSPO P&C INA-NI 2020 indicator 3.8.16	21/07/2020	Closed 20/10/2020
1937165-202007-M3	Major	RSPO P&C INA-NI 2020 indicator 6.6.2	21/07/2020	Closed 20/10/2020
1937165-202007-M4	Major	RSPO P&C INA-NI 2020 indicator 7.10.1	21/07/2020	Closed 20/10/2020

3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Inti Indosawit Subur – Buatan I POM Certification Unit’s environmental and social performance, legal and any known dispute issues. Stakeholder notification has been made on 9th February 2021 and uploaded in the RSPO website <https://www.rspo.org/certification/public-announcement>

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	
<p>Internal Stakeholders</p> <p>Gender Committee: Ibu Yusniarty (Chief of Gender Committee in Scheme Smallholder PT IIS - Buatan Group)</p> <p>Workers of PT Inti Indosawit Subur – Buatan I POM and Supply Bases</p>	<p>Union/Contractors</p> <p>Penghulu/Head Bukit Agung Village: Bpk. Parlaungan Panjaitan</p> <p>Union Labor –PUK SPSI: Siswanto as Chief of PUK SPSI PBD Bpk. A. Stenly T. as Secretaris of PUK SPSI PBS</p>
<p>Government Departments</p> <ul style="list-style-type: none"> ▪ Environmental Office of Pelalawan Regency: Bpk. Demsi Suridal (Kasi. Perlindungan) ▪ Department of Plantation in Pelalawan Regency: Bpk. Davis Riswan ▪ Department of Manpower of Pelalawan Regency: Bpk. Iskandar <p>Consultation was conducted by phone to prevent the covid-19 outbreak and follow the social distancing policy.</p>	<p>NGO</p> <p>LPA - Lembaga Perlindungan Anak Kab. Pelalawan: Bpk. Tohap P. Sianipar</p>

Stakeholders comment	
1.	<p>Feedbacks: Dinas Perkebunan Kabupaten Pelalawan – Plantation Agency Pelalawan Regency Bpk. Davis Riswan</p> <ul style="list-style-type: none"> ▪ PT Inti Indosawit Subur – Buatan I POM has obtained HGU and in line with spatial planning for Pelalawan Regency, as cultivation/plantation area. ▪ Company has reported the plantation operation activities on regular basis to “Dinas Kehutanan dan Perkebunan Kabupaten Pelalawan Semester I 2017”. ▪ There was issue related to request from community for company to release cemetery land and request for company to release land for marketplace development. ▪ The company has obtained Plantation Business Permit (IUP) ▪ There is no report related to land claim and land dispute occurred and submit by community or other company. ▪ FFB price established based on market price, and company was not bound to FFB price regulated by “Keputusan Penyusunan Harga TBS Propinsi Riau”. Based on report, PT Inti Indosawit Subur – Buatan I POM has price structure better than other companies. ▪ If the plasma replanting program has been agreed by all parties, it should be immediately submitted to the Pelalawan District Plantation Office. <p>Management Responses: Company acknowledge the comment from Plantation Agency. Related to the Replanting Scheme smallholder Buatan II Program: On February 16, 2020, request for information from KUD Kebun Sawit Harapan letter No. 60/KUD-KSH/II/2020, regarding the replanting socialization and has been responded to on February 16, 2020, which will be carried out on February 20, 2020.</p> <p>Audit Team Findings: Audit team had verified PT Inti Indosawit Subur – Buatan I POM related to Plantation management and monitoring performance.</p>
2.	<p>Feedbacks: Environmental office of Pelalawan Regency - Dinas Lingkungan Hidup Kabupaten Pelalawan Bpk. Demsi Suridal (Kasi. Perlindungan)</p> <ul style="list-style-type: none"> ▪ Company has revised the AMDAL document. ▪ Company has an environmental document related to development of biogas plant and kernel crushing plant. ▪ Replanting activity has been covered in environmental management and monitoring plan. ▪ Company has consistently reporting the environmental management: Laporan RKL-RPL, Laporan Pengelolaan Limbah B3, Laporan Pemanfaatan Limbah Cair. ▪ PT Inti Indosawit Subur – Buatan I & II POM has performed environmental management in good manner. ▪ Hazardous waste/LB3 monitoring report on Shelter Temporary (TPS) Hazardous waste/LB3 has been done. ▪ Company has managed the hazardous waste, obtained permit for temporary storage – in accordance with relevant regulation. ▪ There was no report from stakeholder on environmental pollution caused by plantation operation of palm oil mill operation.

	<ul style="list-style-type: none"> ▪ There is a request from the community of Pangkalan Kerinci City for the procurement of public cemeteries by taking the HGU area of PT IIS covering area 4 Ha. <p>Management Responses:</p> <ul style="list-style-type: none"> ▪ For the positive things that have been done will be maintained and improved towards a better by management companies. ▪ In the face of replanting activities, of course there are many social issues arising from environmental impacts. In this case, the company has conducted a social impact aspect (SIA) assessment which subsequently made a social impact management plan. Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones presented in "<i>Rencana Kelola Dampak Sosial dan Rencana Pemantauan Dampak Sosial</i>". ▪ Related to requests for Public Cemeteries (TPU:Tempat Pemakaman Umum) by the people of Pangkalan Kerinci City: On February 9, 2021, an audience was held in the Auditorium Room, 3rd Floor of the Pelalawan Regent's Office, Pangkalan Kerinci. The hearing was attended by the Regional Secretary of Pelalawan: Bpk. Tengku Mukhlis, Deputy Chairperson of Commission I of the Pelalawan Regency DPRD: Bpk. H Abdullah, the Head of the Pelalawan BPN office: Bpk. Ruslan Indra, the Riau Regional Public Relations Manager for Asian Agri Group: Bpk. Ahmad Taufik SH and dozens of representatives of the LPM and RT Forums, RW and Pangkalan Kerinci District. On that occasion, PT Inti Indosawit Subur (PT IIS), represented by Bpk. Taufik as Public Relations state that PT IIS had approved the assistance of 3 hectares of TPU land to the community. The management of PT. IIS is seeking 4 options for the land to be given, including Desa Makmur, which is located on the west Kerinci road. From 4 location points which will be realized and 2 locations have been negotiated by the team and 2 more locations will be met directly with the owner for negotiations. <p>Audit Team Findings:</p> <p>Audit team has verify the record of follow up action by company related to a request from the community of Pangkalan Kerinci City for the procurement of public cemeteries by taking the HGU area of PT IIS covering area 4 Ha. Management of PT IIS has well respond to follow up the local community request, currently the management of PT. IIS is seeking 4 options for the land to be given, including Desa Makmur, which is located on the west Kerinci road. From 4 location points which will be realized and 2 locations have been negotiated by the team and 2 more locations will be met directly with the owner for negotiations. Audit team will continue to monitor PT Inti Indosawit Subur – Buatan II POM related to Environmental management and monitoring performance.</p>
<p>3.</p>	<p>Feedbacks:</p> <p>Department of Manpower of Pelalawan Regency: Bpk. Iskandar (Kabid Hubinsyakar)</p> <ul style="list-style-type: none"> ▪ Generally, PT Inti Indosawit – Buatan II POM has built good communication with Manpower and Transmigration Office – Pelalawan Regency. ▪ PT Inti Indosawit Subur – Buatan II POM has complied well with legislation related to employment, i.e; <ul style="list-style-type: none"> - Company has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water,

	<p>medical clinic, school/school bus, worship house, personal protective equipment, working tools, etc.).</p> <ul style="list-style-type: none"> - There was no report/complaint logged in related to discriminative action by company. There was no report/complaint logged in related to the use of child worker/under age worker. - Company has submitted health and safety performance report regularly to the manpower agency. - Complaint received from worker union related to medical service provided by "BPJS Kesehatan", in particular medical treatment service from hospital/clinic where no cooperation with BPJS. - There is no industrial relationship dispute occurred from the last year. - No identified issues related to the use of child labor, violence and forced labor. - Company has prepared infrastructure and facility for worker's welfare such as: housing, clean water, electricity, medical facility, education, etc. - There are employees who are identified use of drugs/Narcotic in PT Inti Indosawit Subur – Buatan II POM. <p>Suggestions:</p> <ol style="list-style-type: none"> 1) In relation to the daily worker (PHL), so that the appointment program can be made as a permanent worker if it meets the requirements. 2) PKB is still made by HO Medan, can be considered to make Derivative PKB 						
	<p>Management Responses:</p> <ol style="list-style-type: none"> 1) Based on the employees master for the period December 2020, PT IIS still has temporary workers (Daily: PHL and PKWT) who do the main work, namely: <ul style="list-style-type: none"> ▪ <u>Simpang Perak Estate:</u> Based on employee's master of Simpang Perak Estate period December 2020 verification obtained information as follows: <ul style="list-style-type: none"> - Harvester from period 2010-2015: 12 harvesters - Harvester from period 2016-2019: 57 harvesters - Addition/recruits of harvester in 2020: 23 harvesters <p>So, total of harvester wit the status of daily /temporary works as much as: 92 harvesters</p> ▪ <u>There</u> was only one Promotion of PHL (Daily workers) to SKU (permanent workers) in 2021 on behalf of harvester Radot Butar Butar (refer to memorandum No. 004/HR-RO2/MEMO/SK/01/2021 dated 30 January 2021). ▪ <u>Buatan 2 POM:</u> There is a record of mill operator as per December 2020: <ul style="list-style-type: none"> - Worker from period 2011-2015: 6 workers - Worker from period 2016-2020: 6 workers <p>So, the total of employess in processing with status of daily /temporary worker in Buatan 2 POM as much as 12 workers.</p> ▪ <u>Buatan I Estate:</u> Based on the employee master for the period December 2020, PT IIS – Buatan I Estate still have temporary workers (Daily: PHL) who do cores jobs, namely: <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Harvester</td> <td style="text-align: right;">: 16 workers</td> </tr> <tr> <td>FFB Loader</td> <td style="text-align: right;">: 4 workers</td> </tr> <tr> <td>Total</td> <td style="text-align: right;">: 20 workers</td> </tr> </table> 	Harvester	: 16 workers	FFB Loader	: 4 workers	Total	: 20 workers
Harvester	: 16 workers						
FFB Loader	: 4 workers						
Total	: 20 workers						

	<p>In the 2020 period, 14 harvesting workers were appointed from daily workers (PHL) to permanent workers (SKU), based on the Memorandum from Regional Head Plantation II No. 280/HR-RO2/MEMO/SK/09/2020 dated 08 September 2020, for example:</p> <ul style="list-style-type: none"> - Memorandum No. 280/HR-RO2/MEMO/SK/09/2020 dated 08 September 2020 for the promotion of an employee named David M M.R. Cianipar (harvester) at Buatan I Estate is valid from October 1, 2020. - Memorandum No. 096-099/HR-RO2/MEMO/SK/04/2020 dated 27 April 2020 for the promotion of harvesting workers named: Murzal, Edi Sudrajad, Sugiarto and Joko Prayogi at Buatan I Estate starting from May 1, 2020. <p>2) Company has already programmed an annualy employee promotion on 2019 until 2021, that is: "Program 3 Years of Buatan II POM to Appointment of PHL employees to SKU</p> <p>3) Worker Agreement (PKB) between company and labour union is referred in working regulation, Worker Agreement was registered by "Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja"</p> <p>PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Employment on 4 July 2018. Based on document review, it was noted that the term and condition, such as: working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice are covered in PKB and contracts which have been signed by labour union.</p> <p>Making Working Agreement - PKB which is a derivative of PKB from HO Medan and agreement with PUK SPSI Medan still needs to be communicated and socialized related to the formation of a derivative PKB.</p> <p>Audit Team Findings:</p> <p>The company has taken action in accordance with well-established procedures and persuasive approach, so there is no turmoil/issue.</p> <p>With respect to wages, the use of PPE and SIO, the company has implemented in accordance with relevant law and regulations.</p> <p>Regarding the formation of PKB derived from PUK SPSI, the auditor team will carry out verification at the next audit visit.</p>
<p>4.</p>	<p>Feedbacks:</p> <p>NGO; Child Protection Institution LPA - Lembaga Perlindungan Anak Kab. Pelalawan Bpk. Tohap P. Sianipar</p> <ul style="list-style-type: none"> ▪ There are at least two reasons why child labor is still prevalent in oil palm plantations <ol style="list-style-type: none"> 1) First, poverty in rural areas is the reason parents make their children work on oil palm plantations. 2) The practice of child labor in oil palm plantations is, in essence, triggered by low wages for adult laborers and the obligation to achieve work targets and earn additional money. ▪ With this obligation, these adult workers (parents) finally allow their children to work because they are lulled into the way of life that is regulated by the capitalist. ▪ Their hope of entering the palm oil industry is to get economic benefits, improve living standards such as nutritional consumption and food quality ▪ Based on field observations and consultations with the gender committee, PT IIS - Made by the Group does not prove that there is a practice of child labor or child employment. <p>The company has a very strict policy on child labor and is always socialized to all workers and stakeholders.</p> <p>Management Responses:</p> <ul style="list-style-type: none"> ▪ For the positive things that have been done will be be maintained and improved towards a better

	<p>by management companies.</p> <ul style="list-style-type: none"> ▪ PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, which stated there is not allowed all children to work in every activities/processes in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities". ▪ PT IIS – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003. ▪ Management has conducted a survey and consultation to 40 female workers with a method of interviewing directly in January 2020 to identify the needs for female workers who have children / infants under 5 years and are still breastfeeding. From the results of the survey and consultation, management issued several policies, including: <ul style="list-style-type: none"> ▪ The company is very concerned about children (especially those who are still toddlers) by issuing Policy for employees who are breastfeeding, based on the Memorandum from the Farm Manager No. 171/ES-IIS/MEMO/ 01/20 dated January 4, 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by giving time and place to all female employees who have babies to breastfeed their children once for 45 minutes: morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB. <p>Periodic checkups at the clinic to monitor the health of the baby by providing POSYANDU services once a month at the Central TPA (Child Care Center) including immunization and vitamins.</p> <p>Audit Team Findings: Acknowledge by the auditor as a positive response, and will be monitored at each subsequent audit.</p>
<p>5.</p>	<p>Feedbacks: Head of Bukit Agung Village – Panghulu Desa Bukit Agung: Bpk. Parlaungan Panjaitan</p> <ul style="list-style-type: none"> ▪ Villagers around ethnically are Batak, Javanese, Sundanese and Banjar. ▪ There was no land conflict between company with surrounding community. ▪ No land conflict was reported since hand-over was done in proper settlement in the beginning. ▪ In general communication and coordination between the village government and the Company has been running well. ▪ The Company always responds to any problems submitted by the village government officials or from the surrounding community, villagers have confirmed that organisation has done some positive CSR activities on their surroundings. Routinely companies provide assistance through CSR programs in the form of borrowing heavy equipment (excavators, graders and compactors), scholarships, assistance to the poor, religious facilities, etc. ▪ Access roads surrounding villages are always maintained by the company. ▪ Enclave owner has proper access to their own farm inside company’s farm without any difficulties. ▪ Employee recruitment from the surrounding villages was not adequate. ▪ No identified issues related to the use of child labor, violence and forced labor ▪ There are no reports from the public regarding the operational activities of companies that violate Human Rights such as the Right to Organize and assemble Conduct worship in accordance with beliefs, as well as other practices of violation of Rights such as the use of mercenaries for the intimidation of workers, the sale of human beings etc. <p>Management Responses:</p> <ul style="list-style-type: none"> ▪ Communication is always well established with the surrounding community, so was no land conflict with surrounding community until conduct this audit.

	<ul style="list-style-type: none"> ▪ Routinely companies provide assistance through CSR programs in the form of borrowing heavy equipment (excavators, graders and compactors), scholarships, assistance to the poor, religious facilities, etc. ▪ Improving future CSR programs based on the potential of the village concerned and empowering the community by conducting soft skills training. For example with agricultural and livestock farming programs with at the same time provide direct guidance and direction. ▪ Associated with the establishment of plantations through plasma scheme, which is completed 100% of the plan. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> ▪ It is suggested that PT Inti Indosawit Subur can maintain communication with the community and village apparatus. ▪ CSR programs to be developed in accordance with community empowerment programs and guidance and coaching. ▪ The use of labor to be prioritized to the surrounding community by referring to recruitment procedures.
<p>6.</p>	<p>Feedbacks: Union Labor –PUK SPSI: Bpk. Siswanto as Chief of PUK SPSI PBD Bpk. A. Stenly T. as Secretary’s PUK SPSI PBD Bpk. Walim Waluyan Chief of PUK SPSI Buatan I Group. Bpk. Denny Andri Anno as secretary PUK SPSI Buatan I Group.</p> <ul style="list-style-type: none"> ▪ Company and employee has agreed to establish bipartit organization to resolve issued related to industrial relationship; the organization has been registered to “Dinas Tenaga Kerja Kabupaten Pelalawan”. Meeting between company and employee conducted whenever issues occurred and requires discussion. ▪ Company has provided health and safety training and provided first aid kit to field supervisor/mandor. ▪ Company has a policy to prohibit the recruitment of employee under 18 years old, including family worker in all operation. ▪ Company does not use migrant worker and prohibit force labour. ▪ Worker salary has followed minimum wage as lined out by Riau Province government for year 2017 ▪ There is a collective working agreement between company and employee. ▪ Company has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurane for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment, working tools, etc.). <p>Management Responses: Management will strive to continue and improve the positive practices in implementing company commitment towards health and safety, and upholding the human rights.</p> <p>Audit Team Findings: Acknowledge by the auditor as a positive response, and will be monitored at each subsequent audit. Audit team will continue to monitor PT Inti Indosawit Subur – Buatan II POM related to Plantation management and monitoring performance.</p>
<p>7.</p>	<p>Feedbacks: Gender Committee: Ibu Yusniarty (Chief of Gender Committee in Scheme Smallholder PT IIS - Buatan Group)</p>

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	<ul style="list-style-type: none"> ▪ Company has implemented the policy related to protection reproductive right; such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator. ▪ All female worker in sprayer team and fertilizer team shall join pregnancy test in company clinic, once a month. ▪ There has been no report logged in to committee related to sexual harassment and/or violence. ▪ There is no indication that company practicing sexual harassment, no indication of gender discrimination, no indication of human right violation, and forced labour. ▪ The leader of gender committee has not understood what the work program is and procedure in case of sexual harassment
	<p>Management Responses</p> <p>Management will strive to continue and improve the positive practices in implementing company commitment towards health and safety, and upholding the human rights.</p> <p>The appointment of the head of the new gender committee was conducted in July 2019, so it is necessary to undertake learning and training and briefing related to the knowledge of gender committees.</p>
	<p>Audit Team Findings</p> <p>Audit team will continue to monitor PT Inti Indosawit Subur – Buatan II POM related to Plantation management and monitoring performance.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					

PT Inti Indosawit Subur – Buatan I POM has established since 1985 and has planting palm oil since 1988, 1989, 1990 and 1991. Currently the palm oil has been replanting since 2014 – 2021.

Previous land owner / user comment	
	Feedbacks: Nil
	Management Responses: Nil
	Audit Team Findings: Nil

3.6 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT Inti Indosawit Subur – Buatan I POM has complied with the RSPO Principles and Criteria 2018, Indonesia National Interpretation 2020 for Sustainable Palm Oil 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 Inti Indosawit Subur – Buatan I POM is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Mujinius Jalaraya	Name: Putu Ghryate Yonata Aksa
Company Name: BSI Services Malaysia Sdn. Bhd	Company Name: PT Inti Indosawit Subur – Buatan I
Title: Lead Auditor	Title: Sustainability Coordinator
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: 15 June 2021	Date: 1 July 2021

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>Buatan I POM, Estate and Scheme Smallholder: PT Inti Indosawit Subur – Buatan Group including Scheme Smallholder has had list of information and listed in “<i>Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosawit Subur - Buatan I</i>”, established on 15 January 2020, there are 32 type of document of information, among others:</p> <ol style="list-style-type: none"> 1. Land titles/user rights (Izin Lokasi, Izin Prinsip, IPKH, Sertifikat HGU, HGB and IMB) 2. Occupational health and safety plans (Laporan Pelaksanaan P2K3) 3. Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program) 4. HCV & HCS documentation (Conservation Management Plan, HCV Report, Social Impact Assessment and HCV Identification Report) 5. Pollution prevention and reduction plans (Environmental Management Program, Hazardous waste Report-Laporan LB3, Land Application Report and also Report of physical and chemical analysis of river water) 6. Details of complaints and grievances (Procedure of Information handling, Procedure of “keluhan konflik lahan” and records of and 	<p>Complied</p>

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		<p>recording of deliberation process and compensation).</p> <p>7. Negotiation procedures (Recording of deliberation process and compensation)</p> <p>8. Continuous improvement plans (Continuous Improvement Program)</p> <p>9. Human Rights Policy (including in the Company Policy update on 1 December 2019 including the policy on protection of human rights defenders (HRDs)/Whistleblowers.</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>PT Inti Indosawit Subur – Buatan Group has provide the public information in Bahasa Indonesia. The information contain in the document can be understand with all stakeholder. It was confirmed by audit team during stakeholder consultation. There are 32 information accessible by stakeholder as explain above in indicator 1.1.1.</p> <p>The list of information has been disseminated on 3-7 February 2020 to all operation at workplace and stakeholder. Corporate policy has been socialized/disseminated to all levels of PT IIS – Buatan Group employees on 7-8 July 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 9-10 July 2020 which was attended by 25 stakeholders. Evidence of socialization can be shown during audit.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Requests for information are responded by the department concerned in accordance with their authority. The company has developed a matrix describing the status of each information request and responsible to respond into. The company has appointed personal responsibility in accepting and responding to the request for information from the stakeholders, the personal responsible is the HUMAS (Public Relations). Appointment based on Transfer Letter No. 226/HRD/AA/TL/XI/2014 dated 7 November 2014 and also organisasion raised the Internal Memorandum No. 388/ES-KBN/MEMO/06/2015 dated 1 June 2015 related to Duties and</p>	Complied

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		<p>Responsibilities of Buatan Group Public Relations to Mr. Lindu Simatupang (as a Public Relation on PT IIS – Buatan Group).</p> <p>Certification holder has had a procedure of consultation and communication is records on SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i>. The consultation and communication procedure was socialized to stakeholder on 5 February 2020 and participated by 15 stakeholders.</p> <p>Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.</p> <p>The request for information was recorded on Log Book “<i>Surat Masuk dan Keluar</i>” on period 2019-2020, taken example:</p> <p>Buatan I Estate:</p> <ul style="list-style-type: none"> - On 21 January 2020, request for information from Bappeda Pelalawan Regency Letter no. 050/Bappeda-V/2020/47 related to Request for CSR Implementation Reporting and has been responded to by Public Relations on January 21, 2020. - On February 10, 2020, request for information from the Head of Pangkalan Kerinci sub-district letter no. 800/UM/2020/40, regarding the invitation for the 2020 population census coordination meeting and was responded to on 10 February 2020. - On March 3, 2020, request for information from the Majelis Talim Al Mukhlisin letter No. 002/MT/III/2020 regarding loaning of bus, has been responded to on March 3, 2020 by the Plantation Manager. <p>Smallholder Scheme</p>	
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		<p>Request Information and response from Stakeholder is documented into a log book "Kebun Plasma Buatan", up to May 2020, there was 8 information requests in Plasma/smallholder Division, mostly request EFB for fertilizer in scheme smallholder area. Based on procedure stated that responds for information request within 14 days.</p> <p>Sample seen:</p> <ul style="list-style-type: none"> - On 7 May 2019, request for information from KUD Jaya Makmur (SP-10) letter no. 110/KUD-MU/V/2019, regarding Changes in schedule and transport of TBS Plasma SP-10, has been responded to on May 7, 2019. - On February 16, 2020, request for information from KUD Sumber Rejeki (SP-V) letter No. 60/KUD-SR/II/2020, regarding the replanting socialization and has been responded to on February 16, 2020, which will be carried out on February 20, 2020. - On April 1, 2020, request information from the KUD Sumber Rejeki letter no. 174/KUD-MU/IV/2020, regarding the addition of TBS Plasma SP-X transportation. Responded April 1, 2020. <p>Based on the verification of the information logbook document, all requests for information from stakeholders and other related parties have been responded to in accordance with established procedures.</p> <p>During interview with stakeholder confirmed that if there is an information request from stakeholder, company immediately respond to them. No issue regarding the timeline of information request response from PT Inti Indosawit Subur – Buatan Group.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Certification holder has had a procedure of consultation and communication as per SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i>. This procedure is available in Bahasa Indonesia and can be access by stakeholder. The consultation</p>	Complied

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		<p>and communication procedure was socialized to stakeholder on 5 February 2020 and participated by 15 stakeholders.</p> <p>The company has appointed personal responsibility in accepting and responding to the request for information from the stakeholders, the personal responsible is the HUMAS (Public Relations). Appointment based on Transfer Letter No. 226/HRD/AA/TL/XI/2014 dated 7 November 2014 and also organisation raised the Internal Memorandum No. 388/ES-KBN/MEMO/06/2015 dated 1 June 2015 related to Duties and Responsibilities of Buatan Group Public Relations to Mr. Lindu Simatupang (as a Public Relation on PT IIS – Buatan Group). The Internal Memorandum is also explained about the duties and responsibilities of public relations, including: is responsible for receiving and responding to information from stakeholders.</p> <p>Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.</p> <p>The request for information was recorded on Log Book “<i>Surat Masuk dan Keluar</i>” on period 2019-2020, sample taken:</p> <ul style="list-style-type: none"> - On January 21, 2020, request for information from Bappeda Pelalawan Regency Letter no. 050/Bappeda-V/2020/47 related to Request for CSR Implementation Reporting and has been responded to by Public Relations on January 21, 2020. - On February 10, 2020, request for information from the Head of Pangkalan Kerinci sub-district letter no. 800/UM/2020/40, regarding the invitation for the 2020 population census coordination meeting and was responded to on 10 February 2020. - On March 3, 2020, request for information from the Majelis Talim Al Mukhlisin letter No. 002/MT/III/2020 regarding loaning of bus, has been responded to on March 3, 2020 by the Plantation 	
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		<p>Manager.</p> <p>Smallholder Scheme</p> <p>Request Information and response from Stakeholder is documented into a log book "Kebun Plasma Buatan", up to May 2020, there was 8 information requests in Plasma/smallholder Division, mostly request EFB for fertilizer in scheme smallholder area. Based on procedure stated that responds for information request within 14 days.</p> <p>Sample taken:</p> <ul style="list-style-type: none"> - On May 7, 2019, request for information from KUD Jaya Makmur (SP-10) letter no. 110/KUD-MU/V/2019, regarding Changes in schedule and transport of TBS Plasma SP-10, has been responded to on May 7, 2019. - On February 16, 2020, request for information from KUD Sumber Rejeki (SP-V) letter No. 60/KUD-SR/II/2020, regarding the replanting socialization and has been responded to on February 16, 2020, which will be carried out on February 20, 2020. - On April 1, 2020, request information from the KUD Sumber Rejeki letter no. 174/KUD-MU/IV/2020, regarding the addition of TBS Plasma SP-X transportation. Responded April 1, 2020. 	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>PT IIS - Buatan Group Stakeholder has maintained list of stakeholder update on May 2020. The List of stakeholders consists of several types of stakeholders based on regional levels: village, provincial and national districts (34 stakeholders), including NGO, for example: WWF, Scale Up and LCKI (Lembaga Cegah Kejahatan Indonesia).</p> <p>The list of stakeholders presented in detail about the address, name of person and phone number and also position and title, the list is including of regent of Pelalawan, Environment Agency, Social Office &</p>	Complied

		Workers of Pelalawan Regency, Camat Kerinci Kanan, Head of Village Mekar Jaya and Head of Village Makmur etc.	
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>Buatan I POM and Estate:</p> <p>The company has a corporate policy set on 1 December 2019 in Medan which has been ratified by the Managing Director (Kevin Tio). The company's policy confirms the code of Conduct behaviour in business at point 2); Policy on the conduct of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery and fraud in the use of funds and resources.</p> <p>In the employee selection process, the company has sets policies related the conduct of business ethics in the daily worker agreement (<i>Perjanjian Kerja Harian Lepas</i>), which is stated in the appendix to corporate policies and behaviors that must be complied with. PKB is a joint working agreement for permanent workers, also confirmed about the conduct of business ethics in Article 16 related of the behavior of the bcynical ethics in the company.</p> <p>The company's policy is also published using posters at any strategic places in the plantations (Buatan Estate and Mill). Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Grup on 3- 7 February 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 January 2020 which was attended by 25 stakeholders.</p> <p>A Policy for ethical conduct is including on Company policy has been socialized/delivered to all levels of PT IIS – Buatan Group employees on 21-22 January 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 23-43 January 2020 which was attended by 25 stakeholders.</p>	Complied

		<p>Scheme Smallholder:</p> <p>All KUD has prepared the policy of code of ethical conduct and integrity in all operation and transaction, dated 14 February 2020, which stated: <i>"Berkomitmen dalam perilaku etis dalam berbisnis dalam seluruh transaksi dan operasi bisnis, pel2rangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumber daya"</i>. This policy has been communicated to the members, latest training and socialization against the policy to all Smallholder and KUD employees performed on 14 February 2020. The evidence can be demonstrated during audit such as attendant list and photograph.</p> <p>The policy written in their farmer handbook "Buku Panduan Petani". The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p>	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>The certificate holder has a system or mechanism to monitor the implementation of company policies including the company code of ethics. GM and Public Relations provide responses to an information/case based on the AA GL-5008.1 R1 Procedure, which for the next mechanism is based on the Settlement Procedure with the local community (Procedure No. AA-GL-5009.R1 regarding settlement with the local community, this mechanism also explain related to the reporter's guarantee and disclosure of cases or information.</p> <p>In every transaction resulting from the work that has been completed, Buatan I Group has a mechanism to monitor business ethics policies, for example: in each work completion, a <i>"Berita Acara Penyelesaian Pekerjaan"</i> which has been verified by the Field Assistant and known by the Estate Manager must be made both inti and plasma plantations (smallholders).</p>	Complied

Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies to relevant regulations.	There were no changes of legal requirement of the company. The Certificate Holder able to demonstrate evidence of compliance with relevant legal requirement. All legal requirements comply with the regulations and laws, including those related to land status, occupational health and safety, environmental, labour, agricultural practice, and mill operation, such as: <ul style="list-style-type: none"> • Ijin Prinsip (Principle permit) No.KB.320/859/Mentan/XI/1983 dated 7th November 1983 from Agriculture minister (65,000 Ha). • Ijin lokasi (Location Permit) No.KPTS.57/II/1987, dated 4th February 1987 for 32,000 Ha. • Ijin Pelepasan kawasan from Forestry Ministry (Release forest permit) No.664/Kpts-II/89, dated 31st October 1989. • Ijin pembukaan lahan (land clearing permit) No.1536/II/KW-6/1988, dated 2nd November 1988 from Forestry Ministry Region Riau Province. • Surat Keterangan Pendaftaran Tanah (Land register) from land authority of Pelalawan District No.15/SKPT/X/2004, dated 30th September 2004. • Surat Pendaftaran Usaha Perkebunan (SPUP) from Forestry and Plantation Ministry, No.185/Mentanhut/VII/2000, dated 3rd November 2000. • SK. HGU (Land Title), approved by "Menteri Negara Agraria/Kepala BPN No.10/HGU/1993, dated 13th May 1993 tentang Pemberian HGU atas nama PT. Inti Indosawit Subur, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha". 	Complied

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		<ul style="list-style-type: none"> • HGU (Land titles) No.01, 1993, dated June 19th, 1993. for Buatan Estate (5,781 Ha); • Renewal land title No.145/HGU/BPN/2004, dated November 3rd, 2004. Expired until 2058 from Head of BPN (5,781 Ha); • IMB (Building licenses), there were 6 permits, such as; No.106/2009, 71/2009, 09/2009, 11/1992, 56/2009, 117/1997. • AMDAL (Environmental and Social impact assessment), SEIA No.013/ANDAL/BA/V/95, dated 3rd May 1995, by Agriculture of Ministry. • Revised AMDAL (Dokumen Pengelolaan dan Pemantauan lingkungan) approved by Governor of Riau No.KPTS 975/X/2009, dated 28th October 2009. • Surface water usage permit from Dinas Pertambangan dan Energi, Kabupaten Pelalawan No.14/KPTS/M/2018, dated 5 January 2018 (valid until 4 January 2023). • Temporary hazardous waste store permit No. KPTS.503/BPMP2T-PLY/14/2016 from "Badan Penanaman Modal dan Pelayanan Perijinan Terpadu, Kabupaten Pelalawan", dated 18th March 2016 (valid until 17th March 2021). • Penetapan Kelas Usaha Perkebunan (PKUP) is based on Decree of Bupati Pelalawan Regency no. 107 Tahun 2016 on 7 November 2016 regarding "Penetapan Kelas Usaha Perkebunan Pelalawan 2016 with class: I referring to Permentan No. 98/Permentan/OT.140/9/2013 regarding "Pedoman Perizinan Usaha Perkebunan". • Machinery permit in mill in place. <p>Mill machineries permit:</p> <ul style="list-style-type: none"> • Permit for Sterilizer reference number: 03/B.0050.A and 03/B.0051.A issued on 19th October 1992 for capacity 3.25 	
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		<p>kg/cm²; reference number: 113/BU/PL/2004 and 114/BU/PL/2004 issued on 14th December 2004 for capacity 3.5 kg/cm².</p> <ul style="list-style-type: none"> • Permit for Back Pressure Vessel reference number: 115/BU/PL/2004 issued on 14th December 2004 for capacity 3.5 kg/cm². • Permit for Boiler reference number: 035/KU/PLLWN/2003 issued on 20th October 2003 for capacity 24 kg/cm²; reference number: 117/KU/PL/2004 issued on October 2004 for capacity 24 kg/cm²; reference number: 112/KU/PL/2004 issued on 30th October 2003 for capacity 24 kg/cm². • Permit for Diesel engine, reference number: 135/M-MD/PL/2004 and 135/M-MD/PL/2004 issued on October 2004 for capacity 420 horsepower each. • Permit for Compressor, reference number: B.84/BT-M/W4/VI/1997 and B.86/BT-M/W4/VI/1997 issued on 17th September 1997. • Permit for Turbine, reference number: 003/M— TB/PlIwn/2002 issued on July 2002 for capacity 800 KW; and reference number 83/TU/PLLWN/2004 issued on 1st September 2003 for capacity 1.200 KW. • All machineries were checked regularly by local government with the latest inspection was on 2018 and for 2019 several machinery inspection are being process, for example: Sterilizer 1 ref. no. 027/BU/PL/2005 is still in process still in progress of submission dated 23 May 2019. <p>Scheme Smallholder: Group manager and ICS conducted the evaluation of laws and regulation compliance each year. Latest updated was on 1st January 2017. During audit, Group manager can demonstrated the document of "Evaluasi Kepatuhan Hukum Kebun Plasma Buatan Tahun 2017"</p>	
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		<p>which contain the list/'legal register' of all applicable laws and regulations; consist of: list of regulation, requirement, evaluation record, compliance status, type of document, no. document, validity, source of document, remark. Some example showing compliance to relevant regulation as follows: Smallholder No.1732, 1731, 2614, 2620, 1510, 1522 and 1523 they have land title/SHM and paid the tax accordingly – in order to demonstrate legal compliance.</p> <p>Scheme Smallholder Sample:</p> <p>KUD Jaya Makmur</p> <ul style="list-style-type: none"> • Akte Pendirian Koperasi- Cooperative Establishment Deed: Akta Perubahan Anggaran atas nama Koperasi Unit Desa Jaya Makmur and endorsement by Departemen Koperasi dan Pembinaan Pengusaha Kecil SK no. 1885/BH/XIII dated 8 July 1994. • SHM- land title certificate held by each farmer, sample has taken as below. • NPWP- taxpayer number: 01.746.748.1-222.000 • TDP (Tanda Daftar Perusahaan Koperasi-Sign of Cooperative Company List): no. 04 12 252 00 0242, dated 2 December 2016 valid until 26 October 2020 • SITU Surat Izin Usaha Perdagangan (SIUP) Menengah Kecil-Small Business Trading License: no. 0781/04.12/PK/X/ 2015, dated 26 October 2015. • <i>Surat Izin Tempat Usaha</i> issued by Subdistrict Head of Siak, Bengkalis District, SITU no. 523.33/SITU/VIII/2015/013 dated 28 August 2015 validation for 5 years (28 August 2020). • Sample of private 24 land right: <table border="1" data-bbox="1133 1284 1953 1388"> <thead> <tr> <th>Name</th> <th>Plot/ KT</th> <th>Kavling</th> <th>Scope (Ha)</th> <th>Private land right number</th> <th>Issued date</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Name	Plot/ KT	Kavling	Scope (Ha)	Private land right number	Issued date							
Name	Plot/ KT	Kavling	Scope (Ha)	Private land right number	Issued date										

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		Pardiono	56	1446	2	787	24-Sep-94	
		Muji Yasin	56	1449	2	5223	18-Mar-09	
		Sakum	56	1451	2	774	24-Sep-94	
		Ahmad Saeri	56	1475	2	775	24-Sep-94	
		Sudiono	56	1499	2	770	24-Sep-94	
		Hardo Saronto	56	1501	2	789	24-Sep-94	
		Ngadi	60	1604	2	727	24-Sep-94	
		Nasib Wiyono	60	1619	2	-	24-Sep-94	
		Sukardi	60	1644	2	776	23-Oct-95	
		Rusnadi	60	1645	2	819	24-Sep-94	
		Sikus	60	1647	2	111	24-Sep-94	
		Suprpto	60	1710	2	732	24-Sep-94	
		Khadar	97	1568	2	699	23-Oct-95	
		Wiranto	97	1571	2	701	23-Oct-95	
		Jumian	97	1577	2	709	23-Oct-95	
		Mahyun	97	1579	2	698	23-Oct-95	
		Akamudin	97	1580	2	705	23-Oct-95	
		Viktor Parluhutan Lubis	97	1582	2	703	23-Oct-95	
		Poniman Surip	99	1678	2	235	23-Oct-95	

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		Supatmo	99	1680	2	783	23-Oct-95
		Slamet	99	1719	2	749	23-Oct-95
		Abdul Manaf	99	1720	2	747	23-Oct-95
		Salimin	99	1724	2	743	23-Oct-95
		Suyari	99	1725	2	742	23-Oct-95
		KUD Sumber Rezeki					
		<ul style="list-style-type: none"> Akte Pendirian Koperasi - Cooperative Establishment Deed: Akta Perubahan Anggaran atas nama Koperasi Unit Desa Sumber Rezeki and endorsement by Departemen Koperasi dan Pembinaan Pengusaha Kecil SK no. 103/BH/PAD/KWK.4/5.1/II/1996 dated 19 February 1996. SHM- land title certificate: held by each farmer, sample has taken as below. NPWP- taxpayer number: 02.174.813.2-222.000 TDP (Tanda Daftar Perusahaan Koperasi-Sign of Cooperative Company List): no. 04 14 19 252 00 0018, dated 14 February 2019 valid until 14 February 2024. Surat Izin Usaha Perdagangan (SIUP) Menengah Kecil-Small Business Trading License: no. 04.19/SIUP/2019/02, dated 14 February 2019, validation for 5 year (14 February 2024). Surat Izin Tempat Usaha (SITU) yang dikeluarkan oleh Camat Kerinci Kanan, Kabupaten Siak, SITU no. 523.33/SITU/II/2019/06 dated 14 February 2019 validation for 5 years (14 February 24). Sample of private 24 land right: 					
		Name	Plot	Kavling	Scope (Ha)	Private land right number	Issued date

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		Kamiso	100	1732	2	773	1995	
		Munasan		1731	2	768	1995	
		Salam		1728	2	760	1995	
		Edi		1674	2	770	1995	
		Salam		1727	2	758	1995	
		Suradi		1740	2	756	1995	
		Muh	73	2169	2	198	1994	
		Nuryono		2217	2	202	1994	
		Irin		2183	2	226	1994	
		Runiah		2182	2	209	1994	
		Nisman		2220	2	219	1994	
		Suwanto		2098	2	199	1994	
		Karlan	67	2010	2	113	1994	
		Munawin		2125	2	110	1994	
		Parlaungan Panjaitan		2014	2	117	1994	
		Parlaungan Panjaitan		2024	2	96	1994	
		Monang Manulang		2048	2	105	1994	
		Neri		2046	2	99	1994	
		Sujito	68	2134	2	141	1994	
		Utar Sutarya		2138	2	173	1994	

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		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">Suhi</td> <td style="width: 20%;"></td> <td style="width: 10%;">2137</td> <td style="width: 10%;">2</td> <td style="width: 10%;">137</td> <td style="width: 10%;">1994</td> </tr> <tr> <td>Riaman</td> <td></td> <td>2142</td> <td>2</td> <td>164</td> <td>1994</td> </tr> <tr> <td>Slamet</td> <td></td> <td>2147</td> <td>2</td> <td>139</td> <td>1994</td> </tr> <tr> <td>Sumarlan</td> <td></td> <td>2146</td> <td>2</td> <td>135</td> <td>1994</td> </tr> </table> <p>During this audit, auditor team has visited the smallholder sample which is 14 sample from KUD Jaya Makmur and 14 sample from KUD Sumber Rejeki. All smallholder plot has been equipped with boundary poles. All boundary poles were in a good condition. Based on the interview with the smallholder and board of KUD's, there is no land dispute issues.</p>	Suhi		2137	2	137	1994	Riaman		2142	2	164	1994	Slamet		2147	2	139	1994	Sumarlan		2146	2	135	1994	
Suhi		2137	2	137	1994																						
Riaman		2142	2	164	1994																						
Slamet		2147	2	139	1994																						
Sumarlan		2146	2	135	1994																						
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.	Public affair department has conducted annual evaluation of legal compliance. The last evaluation is on February 2021. Based on the evaluation document obtained information that there are 7 (seven) new regulation related to plantation business. For example, Government Act No. 36 year 2021 related to payments. According to the evaluation, the company has complied with the regulation. Another regulation that has been evaluated was Presidential Regulation No. 44/2020 and Agricultural Minister Decree No. 38/2020 related to Indonesian Sustainable Palm Oil (ISPO).	Complied																								
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	<p>According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles. Based on field visit concluded that the boundary poles area well maintained. For example:</p> <ul style="list-style-type: none"> • Boundary poles No. 14 Block A91f Afdeling 1 • Boundary poles No. 15 Block A91f Afdeling 1 • Boundary poles No. 16 Block B19j Afdeling 2 <p>The boundary poles recorded in document no. 002/LAP/KBN-KSP/SSL/X/2020. The poles monitored twice a year. The last</p>	Complied																								

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		monitoring held on 21 – 22 October 2020. All poles reported in good condition.	
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available.	<p>Certificate holder has had a list of contractors in mill and estate. Some of the contract as follows:</p> <ol style="list-style-type: none"> 1. School Bus on behalf of Sri Rahayu (Contract No. 008/E2KBN/01/2020 dated 1 January 2020). 2. FFB transporter on behalf of Wongso Santoso (Contract No. 009/E2KBN/01/2020 dated 1 January 2020). 3. FFB/EFB transporter on behalf of Parlaungan Panjaitan (Contract No. 010/E2/KBN/01/2020 dated 1 January 2020). <p>Moreover, certificate holder also had a contractual agreement with temporary worker. Until June 2020, estate had 268 contracts whilst mill had 16 contracts. All contract has been registered in local labour agency.</p> <p>Worker contract has completed with some important clause such as:</p> <ol style="list-style-type: none"> 1. The company policy related to children/underage worker, anti-drugs etc. 2. Workers payment referred to local minimum payment's regulation. 3. All worker will be register in health insurance and workers insurance according to national regulation. <p>The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in estate and mill.</p> <p>During onsite audit, Buatan I POM do not have any contract with third party. However, Buatan Estate has several contracts related to operational activity as follows:</p> <ol style="list-style-type: none"> 1. School Bus on behalf of Sri Rahayu (Contract No. 002/E2KBN/01/2021 dated 1 January 2021). 	Complied

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		<p>2. FFB transporter on behalf of Wongso Santoso (Contract No. 004/E2KBN/01/2021 dated 1 January 2021).</p> <p>3. EFB transporter on behalf of Parlaungan Panjaitan (Contract No. 003/E2KBN/01/2021 dated 1 January 2021).</p> <p>All contract has been verified by the auditor. Based on the interview with the contractor, all working agreement has covered the issues such as occupational safety and health, no underage worker and payments. There are no dispute issues so far.</p>	
2.2.2	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p>	<p>FFB supplier from local contractor:</p> <ol style="list-style-type: none"> 1. Djon Rinaldi (CV Putra Kembar Sentosa (PBS-A) → 4,500 Ha 2. Parlaungan Panjaitan (CV Maju Bersama) → 3,000 Ha 3. Ilham (ILM) → 122 Ha 4. Sudiyono (SYN) → 275 Ha 5. Narimin (NRM) → 200 Ha 6. Sunardi → 150 Ha 7. Sawit Jaya Mandiri (SJM) → 150 Ha 8. PT Rimbun Sawit Sejahtera → 5,839 Ha <p>According to company policy regarding to traceability, they has conducted traceability project to verify their supply chain. Refer to sustainability report 2017 – 2018 that can be downloaded in https://www.asianagri.com/images/pdf/2019/Asian%20Agri%20Sustainability%20Report%202017-2018.pdf stated:</p> <p><i>"Asian Agri reinforced its commitment to traceability by engaging Meo Carbon Solution from Germany and SNV from The Netherlands as traceability consultants to assist with our supply chain traceability project. Commencing in October 2018, Asian Agri began supply chain traceability projects in North Sumatra and Riau. These projects complement the first traceability verification programmes for our</i></p>	Complied

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		<p><i>partner independent smallholders in Jambi Province which began in 2016 and were done in collaboration with IDH and Yayasan SETARA Jambi. These ongoing projects will eventually provide us with recommendations on how to further improve our systems and procedures for a more traceable and responsibly supply chain”.</i></p> <p>During this onsite audit, there are two additional supplier which is Sawit Jaya Mandiri (long term agreement) and PT Rimbun Sawit Sejahtera (short term agreement – due to their mill under repaired). Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ul style="list-style-type: none"> • List of supplier member • Coordinate and its overlay RTRW map. • Personal tax identification of Sawit Jaya Mandiri. • Business permit ID. • Trading permit ID. • Environmental permit. • Location permit • Registration of health insurance (BPJS Kesehatan) • Copy of bank account <p>Based on document verification report above, the CSV staff submitted the report of verification to FFB Purchase Department to issue the Agreement Letter (Surat Perjanjian Kerjasama). There is an Agreement Letter on FFB Supply No. 01/CSV-KBN/II/2020 dated 10 February 2020.</p>	
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2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>Third party contract with some FFB has completed with some important clause such as:</p> <ul style="list-style-type: none"> • The company policy related to children/underage worker, anti-drugs etc. • Workers payment referred to local minimum payment’s regulation. • All worker will be register in health insurance and workers insurance according to national regulation. <p>The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in estate and mill.</p>	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	<p>As stated in sustainability reports of Asian Agri 2017 – 2018 (2019 still on progress) stated that <i>"Asian Agri reinforced its commitment to traceability by engaging Meo Carbon Solution from Germany and SNV from The Netherlands as traceability consultants to assist with our supply chain traceability project. Commencing in October 2018, Asian Agri began supply chain traceability projects in North Sumatra and Riau. These projects complement the first traceability verification programmes for our partner independent smallholders in Jambi Province which began in 2016 and were done in collaboration with IDH and Yayasan SETARA Jambi. These ongoing projects will eventually provide us with recommendations on how to further improve our systems and procedures for a more traceable and responsibly supply chain"</i>.</p> <p>During this onsite, there are two additional supplier which is Sawit Jaya Mandiri (long term agreement) and PT Rimbun Sawit Sejahtera (short term agreement – due to their mill under repaired). Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and</p>	Complied

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		<p>tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ul style="list-style-type: none"> • List of supplier member • Coordinate and its overlay RTRW map. • Personal tax identification of Sawit Jaya Mandiri. • Business permit ID. • Trading permit ID. • Environmental permit. • Location permit • Registration of health insurance (BPJS Kesehatan) • Copy of bank account <p>Based on document verification report above, the CSV staff submitted the report of verification to FFB Purchase Department to issue the Agreement Letter (Surat Perjanjian Kerjasama). There is an Agreement Letter on FFB Supply No. 01/CSV-KBN/II/2020 dated 10 February 2020.</p> <p>By signed this agreement letter, Sawit Jaya Mandiri has officially record as FFB Supplier of Buatan I POM.</p>	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	<p>During this onsite, there are three indirectly sourced FFB supplier which is: CV Putra Kembar Sentosa, CV Maju Bersama, CV Mandiri Sentosa. Based on document verification and interview with Create Share Value (CSV) staff obtained information that the suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers member land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ul style="list-style-type: none"> • List of supplier member 	Complied

		<ul style="list-style-type: none"> • Coordinate and its overlay RTRW map. • Personal tax identification. • Business permit ID. • Trading permit ID. • Environmental permit. • Location permit • Registration of health insurance (BPJS Kesehatan) • Copy of bank account 	
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			
<p>3.1.1</p>	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p>	<p>Certificate holder has provided long-term management plan in document <i>Rencana Jangka Panjang period 2020 – 2025</i>. This document described the five-year business projection of PT Inti Indosawit Subur.</p> <p>Long-term management plant of PT Inti Indosawit Subur has documented in <i>Rencana Jangka Panjang period 2020 – 2025</i>. The long-term management plan covered parameter as follows:</p> <ul style="list-style-type: none"> • Hectare statement of mature and immature area • Estimation of production (Tonnes) • Estimation of FFB purchase (for Mass Balance Mill) • Extraction projected (%) • Cost estimation (IDR/Kg) • Estimation of price (IDR/Tonnes) • Estimation of profit (IDR) 	<p>Complied</p>

		<p>The same information of long-term management plan document also sighted for smallholders.</p> <p>Based on interview with head clerk and sustainability staff, PT Inti Indosawit Subur has started to engage with independent smallholder named Create Share Value (CSV) near the Inti Indosawit Subur's concession since a couple year ago and renewed annually.</p>																																																		
<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p>	<p>Own Estate: Sighted the replanting program period as follows:</p> <table border="1" data-bbox="1133 660 1827 967"> <thead> <tr> <th>Year</th> <th>Program (Ha)</th> <th>Realization (Ha)</th> </tr> </thead> <tbody> <tr><td>2014</td><td>32</td><td>32</td></tr> <tr><td>2015</td><td>428</td><td>428</td></tr> <tr><td>2016</td><td>650</td><td>650</td></tr> <tr><td>2017</td><td>590</td><td>590</td></tr> <tr><td>2018</td><td>803</td><td>803</td></tr> <tr><td>2019</td><td>848</td><td>848</td></tr> <tr><td>2020</td><td>836</td><td>560*</td></tr> <tr><td>2021</td><td>572</td><td>-</td></tr> <tr><td>2022</td><td>842</td><td>-</td></tr> </tbody> </table> <p>Based on the replanting activity photos, there is no fire usage during the process. All process proceeds by heavy weight for tree falling, chipping, pry the roots, digging etc.</p> <p>Scheme smallholders:</p> <table border="1" data-bbox="1133 1161 1935 1329"> <thead> <tr> <th rowspan="2">SP</th> <th rowspan="2">KUD</th> <th colspan="5">Replanting Program (Ha)</th> </tr> <tr> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>III</td> <td>Bhakti Mandiri</td> <td>562</td> <td>260</td> <td>158</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Year	Program (Ha)	Realization (Ha)	2014	32	32	2015	428	428	2016	650	650	2017	590	590	2018	803	803	2019	848	848	2020	836	560*	2021	572	-	2022	842	-	SP	KUD	Replanting Program (Ha)					2019	2020	2021	2022	2023	III	Bhakti Mandiri	562	260	158	-	-	<p>Complied</p>
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3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	<p>Buatan I estate:</p> <p>The company has had annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE).</p> <p>VA Buatan Estate: Report No. VA-KBN-SEPTEMBER-FULL-02-2020-Full Report, date of visit 14 – 17 September 2020. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrows, manuring, pest & disease, castration, supplying and consolidation. Sighted the fertilizer were noted in the lower frond axils as they were supplied too close with the palm bases and the supervisors did not carry out manuring verification.</p> <p>VE Buatan I POM: Report No. VE-PBS-JUN-FULL-01-2020-Full Report, date of visit 13 – 17 July 2020. There were no main issues in this estate. However, there</p>	Complied																												

		<p>were a key issue related to sterilizer’s body condition including the lock ring gate that worn out.</p> <p>Scheme smallholders:</p> <p>There was a record of Deputy Head of Smallholder on 19 June 2020. Based on the minutes of meeting, Deputy Head of Smallholder launched android apps namely “Pembina Sejati” in Buatan Smallholder. This android apps are very useful for smallholder staff and smallholder itself to reporting the daily activity such as harvesting, upkeep and replanting.</p>	
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p>	<p>Certificate holder has conducted several trainings to empowering independent smallholder through one day coaching clinic namely <i>Pelatihan Dinamika Kelompok</i>. The last has been held on 12 December 2019 and attended by 30 participants (villagers surrounding concessions area).</p> <p>During onsite audit obtained information related to improvement in smallholder management by using Android Apps namely “Pembina Sejati”. This android apps are very useful for smallholder staff and smallholder itself to reporting the daily activity such as harvesting, upkeep and replanting. This apps intended to increase transparency and trust between smallholder and management unit.</p> <p>In addition, the management of Kebun Plasma Buatan has conducted the annual schedule of awareness/socialization and refreshment training to updating smallholder’s knowledge and awareness related palm oil sustainability. For example:</p> <ul style="list-style-type: none"> • Sustainability awareness, first aid and integrated pest management training on 19 February 2021 located in meeting 	<p>Complied</p>

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		<p>room of Plasma Buatan. This training attended by 13 representatives participant from smallholder.</p> <ul style="list-style-type: none"> Basic fire training, Occupational Safety and Health and HCV management training on 26 November 2020,, located in meeting room Buana Bakti Village. Due to Covid 19 pandemic, the attendance is limited to the representatives from respective KUD's, which is only 29 participants. <p>Buatan I Palm Oil Mill has an action plan for Continuous improvement: optimizing EFB press waste as a boiler fuel. The improvement plan has been implemented and well monitored.</p> <p>Buatan Estate has an action plan for Continuous improvement: reducing cost for loose fruit picked up by separating loose fruit picked system. This system has been implemented and well monitored. Beside that Buatan Estate has an improvement of riparian enhancement by planting the local trees along the riparian and protect the riparian zone from chemical application.</p>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	<p>Based on explanation of management representatives, until audit finish the RSPO Metric Template still not finalized. Certificate holder only submit their ACOP's.</p> <p>In accordance with ACOP 2019, certificate holder has been submitted the ACOP report to the RSPO secretariat on 4 June 2020. According to the report, certificate holder has a program to supporting independent smallholder groups.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Certificate holder has standard operational procedure for operational activity in estate and mill as follows:</p> <p>Standard Operational Procedures (SOP) for estate that covering entire operational activity as follows:</p>	Complied

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		<ol style="list-style-type: none"> 1. SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery). 2. SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). 3. SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance); 4. SOP AA-APM-OP-1100.04-R3 dated 7 December 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance). 5. SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation). 6. SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops). 7. SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms). 8. SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control). 9. SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application). 10. SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control). 11. SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling). 12. SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested. 13. SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> for 	
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		<p>(Pruning).</p> <p>14. SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification).</p> <p>15. SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census).</p> <p>16. SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm).</p> <p>17. SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management).</p> <p>18. SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting).</p> <p>19. SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport).</p> <p>20. SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting).</p> <p>Mill SOP's:</p> <p>1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station;</p> <p>2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer;</p> <p>3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation;</p> <p>4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan dan Pengempaan</i> for Pressing Station;</p> <p>5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification;</p> <p>6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun</i></p>	
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		<p><i>Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation;</p> <p>7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station;</p> <p>8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>;</p> <p>9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>;</p> <p>10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>;</p> <p>11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: <i>Laboratorium</i>;</p> <p>12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment;</p> <p>13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation;</p> <p>14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance;</p> <p>15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG)</i></p> <p>16. SOP AA-MPM-OP-1400.18-R4 Book Keeping</p> <p>17. AA-MPM-OP-1400.17-R6 Traceability</p> <p>During onsite audit, auditor has conducted field visit to the Buatan Estate as follows:</p> <ul style="list-style-type: none"> Harvesting in Block A91a Afdeling 1. The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure. 	
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		<ul style="list-style-type: none"> • Barn owl box Block A91a Afdeling 1. The management unit using natural predator to control rat infestation. According to the interview, there are 8 barn owl boxes to covering 782 Ha of Afdeling 1 (mostly now on replanting activity). • Chemical weeding Block A91c Afdeling 1. Chemical weeding in circle and path by using herbicide with active ingredients isopropyl amine glyphosate and metil metsulfuron. The spraying activity using VVLV (very very low volume) sprayer to minimize the herbicide usage. • Replanting area Block A21c Afdeling 2. Replanting using heavy weight, there is no fire usage. • Fertilizer application Block B19a Afdeling 2. According to fertilizer recommendation, Buatan Estate conducted fertilizer application using TSP with dosage 0.6 kg/palm. The fertilizer applicator can demonstrate the application and safety working procedure. • EFB application Block B20g Afdeling 2. Unit management using EFB in immature palm to enrich the soil fertility, maintain soil moisture and reducing weeding especially in circle. EFB placing in each palm circle with dosage 27 ton/Ha or equal to 200 – 250 kg/palm. 	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>A mechanism to check consistent implementation of procedures company has had annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE).</p> <p>VA Buatan Estate:</p> <p>Report No. VA-KBN-SEPTEMBER-FULL-02-2020-Full Report, date of visit 14 – 17 September 2020. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrows, manuring, pest & disease, castration, supplying and consolidation. Sighted the fertilizer were noted in the lower frond axils as they were supplied too close</p>	Complied

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		<p>with the palm bases and the supervisors did not carry out manuring verification.</p> <p>VE Buatan I POM: Report No. VE-PBS-JUN-FULL-01-2020-Full Report, date of visit 13 – 17 July 2020. There were no main issues in this estate. However, there were a key issue related to sterilizer’s body condition including the lock ring gate that worn out.</p> <p>Scheme smallholders: There was a record of Deputy Head of Smallholder on 19 June 2020. Based on the minutes of meeting, Deputy Head of Smallholder launched android apps namely “Pembina Sejati” in Buatan Smallholder. This android apps are very useful for smallholder staff and smallholder itself to reporting the daily activity such as harvesting, upkeep and replanting. The advisory visit scheduled annually. Generally conducted on July.</p>	
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Certificate holder conducted monitoring of operational activity in all level of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvesters. The report submitted to estate manager daily. Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager.</p> <p>To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review is implemented by respective staff.</p>	Complied
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			

<p>3.4.1</p>	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p><u>Environmental Impact Assessment (EIA):</u> Environmental impact assessment are available under documents, i.e:</p> <ul style="list-style-type: none"> - PT. Inti Indosawit Subur – Buatan POM has demonstrated a document of, tentang Studi Analisis Dampak Lingkungan (ANDAL) Perkebunan Kelapa Sawit Pola PIR-Transmigrasi dan Pabrik Minyak kelapa Sawit (PMKS) di Kabupaten Kampar, Indragiri Hulu dan Bengkalis, Propinsi Riau, mill capacity 30 tonnes FFB/hours. - PT. Inti Indosawit Subur – Buatan POM has demonstrated a document Environmental Management and Monitoring Document “Dokumen Pengelolaan dan Pemantauan Lingkungan” year 2009. The document has been approved by Governor of Riau through “Surat Keputusan Gubernur Riau No.Kpts.975/X/2009 tentang Penetapan Dokumen Pengelolaan dan Pemantauan Lingkungan Penambahan Kapasitas Produksi Pabrik Minyak Kelapa Sawit PT. Inti Indosawit Subur dan Kegiatan Pendukungnya, Sentral Workshop Buatan dan Pembuatan Laboratorium Kultur Jaringan Berlokasi di Kecamatan Pangkalan Kerinci dan Kecamatan Pelalawan, Kabupaten Pelalawan; Kecamatan Kerinci Kanan dan Kecamatan Dayun, Kabupaten Siak, Provinsi Riau” – dated 28th September 2009. Mill capacity 60 ton FFB/hour. - Kernel Crushing Plant and Biogas Plant; the EIA is available under document “UKL-UPL (Environmental Management Effort / Environmental Monitoring Effort)” year 2012. Capacity of KCP 260 MT/day. UKL UPL has been approved by Local authorities through letter No.660/BLH-AM/2012/202 dated February 2012. Identified impacts: domestic solid waste, POME, hazardous waste, emission, dust, and noise from KC activities. - KUD (cooperative) holds a set of copy of latest AMDAL documents in the Cooperative office, similar to company. EIA of scheme small holder has been covered by the “Dokumen Pengelolaan dan 	<p>Complied</p>
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		<p>Pemantauan Lingkungan”, for mill with capacity 60 tonnes FFB/hour, Own Estate 5,781 hectares, and Plasma 12,000 hectares. The EIA (DPPL) has met the applicable requirement and has been approved on 2009 through Governor Decree number Kpts.975/X/2009 dated 28th October 2009.</p> <p>The environmental impact assessment carried out by PT. Holistika Primagrahita with team consist of:</p> <p>Team leader: Ir.Nur Iskandar (Fisheries/AMDAL B); Physic/Chemical team: Azni Hamzah, S.Si (Chemical/AMDAL B); Biology team: Khairunnazmi, S.Pi (Aquatic biology/AMDAL B), Marualat Harahap (Agriculture/AMDAL B); Activity: Marualat Harahap (Agriculture/AMDAL B); Social team: Yandra Mufialdo, S.Sos (Social economy); Mapping: M.Irsyadul Anwar, S.Pi</p> <p>All significant impacts have been identified i.e. reduction of soil and water quality, reduction of air quality, impact to socioeconomic of local community, etc. Plan to monitor and manage of each identified environment impact have been provided and documented. The EIA document contained evidence of involvement of surrounding community during study and public consultation with relevant stakeholder.</p> <p>The impact assessment for replanting has identified impacts such as: changes in micro climate, a decrease in air quality, increase in noise level, quantity and quality of surface water, soil erosion and sedimentation, loss of flora and fauna, disturbance to aquatic biota, community health and surrounding environment health.</p> <p>The document has also completed with environmental management and monitoring plan. The plans were explaining type of impact, source of impact, impact parameter, management purpose, management and</p>	
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		<p>monitoring plan, management/monitoring location, management/monitoring timeframe.</p> <p><u>Social Impact Assessemnt (SIA)</u></p> <p>PT Inti Indosawit Subur – Buatan POM has also shown the document of Social Impact Assessment PT Inti Indosawit Subur Kebun Buatan di Kabupaten Siak dan Kabupaten Pelalawan Propinsi Riau, in 2009 by Fakultas Kehutanan Institut Pertanian Bogor.</p> <p>Assessment of aspects of social impacts is done by several methods, including:</p> <ul style="list-style-type: none"> - Focus Group Discussion (FGD) - Deep interview - Structured Interviews <p>During preparation for Social Impact assessment team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials. Record of meeting with affected parties and stakeholder are available and can demonstrated. Evidence of participation with affected parties is to use a questionnaire conducted on 13- 19 April 2009, questionnaires can be demonstrated at the time of the audit</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p>	<p>PT Inti Indosawit Subur – Buatan POM has prepared the plans for management and monitoring of environmental and social impacts to avoid or reduce negative impacts and promote positive ones presented in "Rencana Kelola Dampak Sosial dan Rencana Pemantauan Dampak Sosial year 2019-2020". The plan consisted of:</p> <ul style="list-style-type: none"> - Farmers still lack understanding regarding internal control system (ICS) - level of understanding is about 75%, management plans: conducting training programs related to understanding the ICS and RSPO. 	Complied

		<ul style="list-style-type: none"> - Misunderstanding of Sorting FFB at fruit collection sites (TPH) between farmers and Mill, management plan: Socialization to farmers related to regulation of Permentan no. 14/2013 concerning the "Pelaksanaan sortasi". - Impact of dust on the dry season caused by FFB transport activities to the mill, management: the company performs scheduled watering every day in the morning and evening. - Scheme smallholder PIR Plasma faces constraints in income generation in the face of replanting, management: coaching on other farming, cooperation in replanting and engage scheme smallholder in the work of replanting. <p>In 2020, the environmental management plan was explaining the review and evaluation upon impact from operational activity that has been performed and activity that was going to be performed.</p> <p>Evaluation upon impact from ongoing activities such as:</p> <ul style="list-style-type: none"> - Impact from main activities in oil palm plantation (spraying activity, natural vegetation conservation) - Impact from main activities in palm oil mill (utilization of palm oil mill manpower, FFB processing, palm oil mill effluent management, land application of palm oil mill effluent, application of empty fruit bunch, transport of crude palm oil, palm kernel and logistics, provision and use of clean water). - Impact from supporting activities (energy source operation, central workshop operation, temporary hazardous waste storage, landfill operation); <p>Review and evaluation upon future activities, such as:</p> <ul style="list-style-type: none"> - Activity in tissue culture in laboratory - Replanting activity; within the replanting activity review, team has identified type of impact such as: change in micro climate, air 	
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		<p>quality decrease, increase of noise, dynamics in quantity and quality of surface water, erosion and sedimentation, decrease in terrestrial flora and fauna, disturbance in aquatic life, effect on community health.</p> <p>The document has also completed with environmental management and monitoring plan, gives description type of impact, source of impact, impact parameter, management objective, management/monitoring plan, period of management/monitoring, PIC for management/monitoring.</p> <p>For Smallholder scheme, the type of environmental impact from their oil palm plantation such as: water pollution -> control the spraying and fertilizer application, avoid spraying near water body; soil erosion -> no blanket spraying, frond stacking, degradation on wildlife -> no hunting.</p> <p>Social impact assessment has included the smallholder area and pay attention to the impacts of smallholder schemes. Data verified: Form of consultation with affected parties dated 46th April 2019, e.g: Mr Anisar (45 years old – address: Kerinci Kota Village), Mr Marlis (49 years old – address: Kerinci Kota Village), Mr Amat (47 years old – address: Kerinci Kanan Village).</p>	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.	<p>PT Inti Indosawit Subur and Scheme smallholder have reviewed the document of plan for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones presented in document of:</p> <ul style="list-style-type: none"> - "Data Laporn Review Sosial Impact Assessment (SIA) Dengan Masyarakat Semester II tahun 2019" - "Laporan Izin Lingkungan Kegiatan Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT. Inti Indosawit Subur Buatan" period first semester 2020 (January to June 2020). The report has submitted and accepted by relevant authorities through 	Complied

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		<p>Environmental Electronic Report (SIMPEL) to Ministry of Environmental and Forestry, dated 10th August 2020. ID TTE: 1551798233-1744. PMKS Buatan</p> <p>PT Inti Indosawit Subur – Buatan Group has appointed the responsible person for the implementation and monitoring of EIA document is Manager (Mill, Estate and Plasma) as explained in Job Profile Manual for Manager, point 2 mentioned “Responsible on implementation of environmental permit document and monitoring each six months”.</p>	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p>	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur – Buatan I POM has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation. Procedure for worker recruitment (SDM-A-001-00) and procedure for employee assessment (HRD C- 002-00) was available and mentioned there was no discrimination treatment during recruitment and promotion process. Promotion of worker will be done base on work period, annual evaluation result, and availability of position.</p> <p>In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness.</p> <p>Job opportunities were communicated and given to surrounding villagers at firstpriority where no discrimination found observed during interview and related records of workers being employed. All workers has treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has evaluated by the organization as described in criterion 2.1. Annuals performance evaluation result of worker has shown.</p>	Complied

<p>3.5.2</p>	<p>Employment procedures are implemented and records are maintained.</p>	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>PT IIS has established mechanism related to the employees and payments of wages, including:</p> <ol style="list-style-type: none"> 1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>penerimaan karyawan baru</i>" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question. Sample seen: <ul style="list-style-type: none"> - Perjanjian Kerja Harian Lepas – Daily worker agreement No. 013/PKHL/KTS/12/2020 dated 15 Desember 2020 on behalf of Dervi Sitohang as Child Care worker at pondok batu. This Daily worker agreement has made duplicate. - Perjanjian Kerja Harian Lepas – Daily worker agreement No. 012/PKHL/KTS/08/2020 dated 1 August 2020 on behalf of Dervi Sitohang as Child Care worker at pondok batu. This Daily worker agreement has made duplicate. 2. PT Inti Indosawit Subur – Buatan I POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below: <ul style="list-style-type: none"> - Buatan I POM: Memorandum No. 157/MI-PBS/VIII/2020, dated 11 August 2020. - Buatan Estate: Memorandum No. 391/ES-KBN/MEMO/08/2020, dated 11 August 2020. The policy and procedure has been communicated to workers, especially to temporary workers at Buatan I POM on 22 August 	<p>Complied</p>
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		<p>2020, while in Buatan Estate socialization conducted on 15 August 2020 to workers of Afdeling I - III, Traksi and adminisration. The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p> <p>3. Company has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</p> <p>4. SOP related to the payments No. AA-FA-219.1-R5: "Pengupahan" (Wages) dated 1 May 2016. Described in this SOP, including:</p> <ul style="list-style-type: none"> - The use of presensi card becomes a procedure of using fingerprints - The addition of leave monitoring analysis in the PMS system <p>Changes in payroll procedures from direct giving to employees to transfers via banks in cooperation with companies to eliminate potentially fictitious payment characteristics.</p>	
<p>Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT Inti Indosawit Subur – Buatan POM has established a health and safety policy under "Kebijakan Perusahaan", updated 1st December 2019, was signed by Managing Director. In point 3, the company commit to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. Point 5. Integrating social, environmental, food</p>	Complied

		<p>security, occupational health and safety issues into operational activities, adopting best technology available, and maintain trained manpower, with skills, and motivated to improve performance through continuous improvement program. The policy was also displayed at in public board in Buatan I POM, in each Division Office and Buatan Estate Office.</p> <p>The document of OHS Program available under "Program Manajemen K3 PMKS Buatan I PT Inti Indosawit Subur Tahun 2020", such as:</p> <ul style="list-style-type: none"> - Established the document of hazard identification, risk assesment and its control - Meeting on safety committee/P2K3 (monthly basis) - Report of OHS committee/P2K3 (3 months bases) - Training of emergency response and preparedeness (annually) - Safety briefing (daily) - Providing the PPE for all employees - Inspection on PPE usage - Training for operator in POM and workshop <p>PT Inti Indosawit Subur – Buatan POM has also prepared the procedure to identify and prepare a risk assessment. The updating risk assessment is documented on HIRAC Buatan, dated 1 Feb 2019, rev. 21. Replanting activities are also provided in the updated risk assessment. This Risk Assessment is applicable to all Cooperatives (KUD's) within the certificate scope. The risk in smallholders is more about PPE use during their activities (harvesting and fertilizing).</p> <p><u>Scheme smallholder</u></p> <p>ICS has established the policy related to EHS as per "Kebijakan Manager Group ICS", dated 2nd January 2017. In point 3 mentioned: to pay attention and implementing health and safety culture, using</p>	
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		<p>personnel protective equipment, if necessary, in performing daily work and to maintain the work premises.</p> <p>Group ICS has also demonstrated under "Program Manajemen K3 Kebun Plasma PT Inti Indosawit Subur tahun 2020, program such as:</p> <ul style="list-style-type: none"> - Inspection and monitoring on using of PPE for harvester – daily - Training on emergency and preparedness – once a year - Training of first aider and monitoring of first aid kit - Refresh training of OHS including risk assessment. <p>Record of implementation the OHS program provided in indicator 3.6.2.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>PT Inti Indosawit Subur – Buatan I POM and supply bases has demonstrated the record of realization the OHS program 2020, such as:</p> <ul style="list-style-type: none"> - Report of MCU for all workers in Buatan I mill, was conducted by "Klinik Asian Agri Sehat Buatan", dated 10 December 2020 was attended by 52 workers. The MCU was covered urine test, HSaAg and fisical test. - Monitoring of emergency response and peparedeness facilities, i.e: fire hydrant (9 units) and fire extinguisher (23 units), updated in March 2021, location in Buatan I POM. - Socialization the company's policies, conducted in 3rd January 2020 – location in PBS was attended by 27 workers - Report of OHS inspection report, location in Buatan I POM dated 23rd January 2021 – reported OK for PPE usage, and OHS facilities (fire hydrant and . - Record of handover of PPE, location in KUD Jaya Makmur and KUD Sumber Rejeki dated 9th October 2019; PPE: herlme, safety glasses. 	Complied

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		<ul style="list-style-type: none"> - "Checklist on monitoring of PPE use for harvester in KUD Mulus Rahayu dated 12 and 24 December 2020. Reported Ok for safety helmet, AP boot, safety glasses, chisel cover. <p>Based on field visit in Kavling 1449, 1451 and 1457 in KUD Jaya Makmur; there was found the harvester has used in PPE as required in HIRADC.</p>	
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.	<p>PT Inti Indosawit Subur – Buatan Group (Including Scheme smallholder) has shown the document of training program related to the aspects of RSPO Principles and Criteria has shown under "Program Pelatihan Karyawan PMKS Buatan Satu PT Inti Indosawit Subur – 2020", consist of:</p> <ul style="list-style-type: none"> - Sustainability awareness – (supply chain, traceability), - Basic safety training (refreshment), - Training of basic fire (refreshment - Training on TPM (Total productive maintenance), - Training of work instruction (WI) – refreshment, - Training on preparedness and emergency response, - Awareness training of RSPO PnC for smallholder member - Training of HCV (refreshment) - Training for first aider - Training on handling of limited pesticide for operator sprayer (TUS) - Training of fertilizer application 8, <p>The implementation of training program available in indicator 3.7.2</p>	Complied
3.7.2	Records of training are maintained, where appropriate on an individual basis.	Document of training record has demonstrated, such as:	Complied

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		<ul style="list-style-type: none"> - Refreshment training for OHS, HCV and basic fire dated 30 January 2020, location in KUD Jaya Makmur - Refreshment training of RSPO requirement include PnC and SCCS dated 10 February 2020, location "Gedung Serba Guna Pekanbaru" - Refreshment training for fertilizer application, dated 11 March 2019, location in KUD Sumber Rejeki - Training of PPE usage for harvester dated 14-19 January 2020 - Training for HCV and emergency response for fighter dated 26th November 2020 - Refreshment training for harvester dated 12th December 2020 location in KUD Jaya Makmur <p>Record training for individual basis has also maintained, such as:</p> <ul style="list-style-type: none"> - W*t*m*h (spraying applicator), consist of: Training on limited pesticide handling (26 September 2016), refresh training on chemical/pesticides handling (18 May 2017), refresh training on chemical/pesticides handling (28 June 2018), refreshment training for OHS, HCV and basic fire dated 30 January 2020 - N*ngg*l*n (harvester), consist of: Refresh training on harvesting (20 May 2013), refresh training of PPE usage for harvester dated 14-19 January 2020 - N*sn*r (dispatch operator), consisted of: Training SOP Mass Balance and SOP Traceability" dated 15 May 2019; "Training Traceability and Mass Balance" dated 8 May 2018; refreshment training of RSPO requirement include PnC and SCCS dated 10 February 2020. - G*n*w*t* (weighbridge operator) participated in training: "Training Traceability and Mass Balance" dated 8 May 2018; "Refreshing SOP Mass Balance and SOP Traceability" dated 19 	
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		May 2017; “Refreshing SOP Mass Balance and SOP Traceability” dated 29 November 2016; refreshment training of RSPO requirement include PnC and SCCS dated 10 February 2020.	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been carried out by company on 26 January 2021. Training attend by 8 participants (Mill Manager, Production clerk, weighbridge clerk, KTU/administration, Dispatch and Sustainability team). Evidence of training can be demonstrated. During interview with mill personel confirmed that they have understand regarding the RSPO SCCS implementation and process in Buatan I Palm Oil Mill.	Complied
<p>Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>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 Mass Balance Module is applicable.</p>	PT. Inti Indosawit Subur – Buatan I POM holds current RSPO P&C Certificate No. RSPO 638918, first certification start on 16 September 2010 and expired on 15 September 2020. In the current certificate, PT. Inti Indosawit Subur – Buatan I POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Buatan Estate) and 4 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier (7 Supplier: CV Putra Kembar Sentosa (PBS-A), CV Maju Bersama, Ilham, Sudiyono, Narimin, PT Rimbun Sawit Sejahtera, Sawit Jaya Mandiri). FFB Non certified approximately 73% from total FFB received by Buatan I POM.	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from</p>	PT. Inti Indosawit Subur – Buatan I POM holds current RSPO P&C Certificate No. RSPO 638918, first certification start on 16 September 2010 and expired on 15 September 2020. In the current certificate, PT. Inti Indosawit Subur – Buatan I POM uses Mass Balance supply	Complied

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	<p>its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Buatan Estate) and 4 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier (7 Supplier: CV Putra Kembar Sentosa (PBS-A), CV Maju Bersama, Ilham, Sudiyono, Narimin, PT Rimbun Sawit Sejahtera, Sawit Jaya Mandiri). FFB Non certified approximately 73% from total FFB received by Buatan I POM.</p>	
<p>3.8.3</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of certified CPO and PK that could potentially be produced by PT. Inti Indosawit Subur – Buatan I POM its recorded in RSPO Public Summary report, certificate and RSPO IT Paltform.</p> <p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO100000345.</p> <p>Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2019:</p> <p><u>Forecast volume (August 2019 – July 2020)</u> FFB : 113,386 MT CPO : 21,498 MT (OER: 19.30%) PK : 5,792 (KER: 5.20%)</p> <p><u>Actual production volume (August 2019 –July 2020)</u> CPO: 14,511.75 MT PK: 4,173.26 MT</p> <p><u>Actual sold volume (August 2019 –July 2020)</u> CPO: 0 MT, All volume Sold as ISCC PK: 3,444.33 MT</p>	<p>Complied</p>

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3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>PT. Inti Indosawit Subur – Buatan I POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006.</p> <p>PT Inti Indosawit Subur – Buatan I POM has meet all registration and reporting requirements.</p> <p>RSPO IT Platform/PalmTrace account RSPO_PO1000000021.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>PT. Inti Indosawit Subur – Buatan I POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> • Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Buatan Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. • Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; 	Complied

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		<ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; - SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; - SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; - SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; - SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 Book Keeping - SOP AA-MPM-OP-1400.17-R7 Traceability <p>PT. Inti Indosawit Subur – Buatan I POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records.</p>	
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		<p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>PT IIS Buatan I POM has a procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill, as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> iii) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; iv) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. v) Effectively implements and maintains the standard requirements within its organisation. vi) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. 	<p>PT. Inti Indosawit Subur – Buatan I POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Internal audit for all scheme including RSPO SCCS also refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Semester I year 2020 internal audit SCCS has been conducted on 5 – 6 June 2020 by Hendrik Simanjuntak. Internal audit report were evident, all issue raised during internal audit has been followed up by Corrective Action and Closed. Sample seen on internal audit issue December 2019: There is no Shipping Announcement made for several transaction; Buatan I POM has follow up by coordination with marketing division to complete the sipping announcement; There is no issue of nonconformity raised during internal audit June 2020.</p> <p>Management review conducted once a year as per SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020. Management</p>	<p>Complied</p>

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		<p>review for 2020 has been conducted on 15 July 2020. Input of management review consist of:</p> <ul style="list-style-type: none"> - Internal audit result - Customer feedback - Proses performance and product conformity - Status of Corrective and Preventive Action - Follow up previous management review - Change that could effect to the management system <p>Output of management review has include:</p> <ul style="list-style-type: none"> - Recommendation for improvement - Resources needed. <p>During audit, It was found non conformity that the internal audit findings were not appropriate and the evidence of follow up action cannot be demonstrated.</p> <p>PT Inti Indosawit Subur has made correction and corrective action to address the issue. Detail of correction and corrective action available at section 3.1 Details of Nonconformities. The NC has been Closed on 20 October 2020.</p> <p>During audit onsite on 2 – 5 March confirmed that the internal audit has reconducted and revised as per internal audit report dated 22/08/2020 by internal auditor Hendryk Simanjuntak. It was found that Internal audit has refer to RSPO P&C INA NI 2020 and the report were sufficient. Management review to discuss the internal audit findings and other issues has been carried out on 25 August 2020.</p>	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p>	<p>PT Inti Indosawit Subur – Buatan I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on “Surat Pengantar TBS”, covering</p>	Complied

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	<p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Inti Indosawit Subur – Buatan I POM receive FFB from certified and non-certified source. Certified source consist of own estate (Buatan Estate) and 4 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of Non-certified FFB comes from third-party supplier (5 Supplier: CV Putra Kembar Sentosa (PBS-A), CV Maju Bersama, Ilham, Sudiyono, Narimin).</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar TBS Buatan Estate No.007399" from Division VIII, block A17C dated 17 July 2020 – total 1,512 bunches. Weighbridge ticket "Tiket Timbangan No.PBSA120200299" dated 17 July 2020, for 1,512 FFB bunches; nett weight 1,645 kg; from Buatan Estate, Division VIII, block A17c; vehicle BM8187TC; RSPO certificate No.RSPO638918. - FFB delivery "Barcode SP No. KENDT3920200203172404" from Division I, block A91e & A91f dated 3 February 2020 – total 156 bunches. Weighbridge ticket "Tiket Timbangan No.PBSA120200080" dated 03 February 2020, for 156 FFB bunches; nett weight 4,2450 kg; from Buatan Estate, Division I, block A91e & A91f; vehicle BM8098TK; RSPO certificate No.RSPO638918. - FFB delivery "Surat Pengantar TBS Buatan Estate No.462" from KT 98 Makarti Tama KUD Jaya Makmur, dated 7 July 2020 – total 321 bunches. Weighbridge ticket "Tiket Timbangan No.PBSA220204498" dated 7 July 2020, for 321 FFB bunches; nett weight 8,011 kg; from KT 98 Makarti Tama; Block K498 vehicle 	
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		<p>BM9089CH; RSPO certificate No.RSPO638918.</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar TBS Buatan Estate No.670" from KT 116 Merpati KUD Sejahtera, dated 17 July 2020 – total 158 bunches. Weighbridge ticket "Tiket Timbangan No.PBSA220204739" dated 17 July 2020, for 158 FFB bunches; nett weight 4,592 kg; from KT 116 Merpati; Block K4116 vehicle BM9430CH; RSPO certificate No.RSPO638918. - FFB delivery "Surat Pengantar Buah (SPB) No.779" from KT 67 Tani Makmur KUD Sumber Rezeki, dated 18 December 2020 – total 328 bunches. Weighbridge ticket "Tiket Timbangan No.PBSA220208134" dated 18 December 2020, for 328 FFB bunches; nett weight 8,438 kg; from KT 67 Tani Makmur; Block B11005; vehicle No. BE4451JA; RSPO certificate No.RSPO638918. - FFB delivery "Surat Pengantar Buah (SPB) No. 787" From Kelompok Tani 60 Usaha Mandiri KUD Jaya Makmur" dated 18/12/2020 - total 327 bunches. Weighbridge ticket "Tiket Timbangan No.PBSA220208142" dated 18 December 2020, for 327 FFB bunches; nett weight 11,495 kg; from KT 60 – Usaha Mandiri; Block B05011 vehicle No. BM9061CG; RSPO certificate No.RSPO638918. - FFB delivery "Surat Pengantar TBS Buatan Estate dated 23/12/2020 from Buatan Estate Afdeling VIII, dated 23 December 2020 – total 791 bunches. Weighbridge ticket "Tiket Timbangan No.PBSA120200603" dated 23 December 2020, for 791 FFB bunches; nett weight 6,400 kg; from Buatan Estate Afdeling VIII; Block A14a; vehicle No. BM8467TD; RSPO certificate No.RSPO638918. <p>Non-certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery note: "Surat Pengantar TBS", dated 7 July 2020 From CV Maju Bersama, vehicle code BM8511LC; driver Eko Yono; Weighbridge ticket "Tiket Timbangan No.PBSA520204824" dated 7 	
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		<p>July 2020, for 391 FFB bunches; nett weight 7,818 kg; FFB source from non-certified third party FFB supplier CV Maju Bersama, ID ST00059; vehicle BM8511LC, Driver Eko.</p> <ul style="list-style-type: none"> - FFB delivery note: "Surat Pengantar TBS ", dated 17 July 2020 From CV Putra Kembar Sentosa, vehicle code BM9371SE; driver Jonson; Weighbridge ticket "Tiket Timbangan No.PBSA520205173" dated 17 July 2020, for 489 FFB bunches; nett weight 9,292 kg; FFB source from non-certified third party FFB supplier CV Putra Kembar Sentosa, ID ST00053; vehicle BM9371SE, Driver Jonson. - FFB Delivery note: "Surat Pengantar TBS", dated 30 June 2020 From Supplier Sudiyono, vehicle code BM8885CU; driver Dedek; Weighbridge ticket "Tiket Timbangan No.PBSA520204649" dated 30 June 2020, for 371 FFB bunches; nett weight 7,041 kg; FFB source from non-certified third party FFB supplier Sudiyono, ID ST00055; vehicle BM8885CU, Driver Dedek. - FFB Delivery note: "Surat Pengantar TBS", dated 30 June 2020 From Supplier Narimin, vehicle code BM8271LS; driver Bima; Weighbridge ticket "Tiket Timbangan No.PBSA520204662" dated 30 June 2020, for 455 FFB bunches; nett weight 8,652 kg; FFB source from non-certified third party FFB supplier Narimin, ID ST00051; vehicle BM8271LS, Driver Bima. <p>Update during onsite audit:</p> <ul style="list-style-type: none"> - FFB Delivery note: "Surat Pengantar TBS", dated 10 December 2020 From Supplier CV Putra Kembar Sentosa, vehicle code BM9812ST; driver: Karsito; Weighbridge ticket "Tiket Timbangan No.PBSA520210260" dated 10/12/2020, for 276 FFB bunches; nett weight 5,529 kg; FFB source from non-certified third party FFB supplier CV Piutra Kembar Sentosa, ID ST00053; vehicle BM9812ST, Driver Karsito. - FFB Delivery note: "Surat Pengantar TBS", dated 10 December 2020 	
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		<p>From Supplier CV Putra Kembar Sentosa, vehicle code BM9812ST; driver: Karsito; Weighbridge ticket "Tiket Timbangan No.PBSA520210260" dated 10/12/2020, for 276 FFB bunches; nett weight 5,529 kg; FFB source from non-certified third party FFB supplier CV Putra Kembar Sentosa, ID ST00053; vehicle BM9812ST, Driver Karsito.</p> <ul style="list-style-type: none"> - FFB Delivery note: "Surat Pengantar TBS", dated 10 December 2020 From Supplier CV Maju Bersama, vehicle code BM8680FZ; driver: Agus; Weighbridge ticket "Tiket Timbangan No.PBSA520210257" dated 10/12/2020, for 425 FFB bunches; nett weight 8,498 kg; FFB source from non-certified third party FFB supplier CV Maju Bersama, ID ST00059; vehicle BM8680FZ, Driver Agus. - FFB Delivery note: "Surat Pengantar TBS", dated 10 December 2020 From Supplier Sawit Jaya Mandiri, vehicle code BM8511LC; driver: Eko Yono; Weighbridge ticket "Tiket Timbangan No.PBSA520210251" dated 10/12/2020, for 205 FFB bunches; nett weight 4,093 kg; FFB source from non-certified third party FFB supplier Sawit Jaya Mandiri, ID A046; vehicle BM8511LC, Driver Eko Yono. - FFB Delivery note: "Surat Pengantar TBS No. Segel 06462", dated 10 December 2020 From Supplier PT Rimbun Sawit Sejahtera, vehicle code BM9448CJ; driver: Parhaean; Weighbridge ticket "Tiket Timbangan No.PBSA520210323" dated 10/12/2020, for 438 FFB bunches; nett weight 7,453 kg; FFB source from non-certified third party FFB supplier PT Rimbun Sawit Sejahtera, ID A029; vehicle BM9448CJ, Driver Parhaean. 	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single</p>	<p>During 2019 – 2020 there is no CPO sold as RSPO certified. All certified CPO sold as ISCC certified. PK certified RSPO was deliver to own Kernel Crushing Plant namely Buatan I Kernel Crushing Plant. The PK certified delivery was completed with Delivery Form.</p>	Complied

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	<p>document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Sample seen of delivery form CSPK from Buatan I POM to Buatan I KCP:</p> <ul style="list-style-type: none"> - Delivery Form No. KCP PBS 1004 SS dated 1 April 2020, From PT IIS – Buatan I POM to PT IIS – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO638918, quantity 355,980 kg, transport by Fan/Pipe. - Delivery Form No. KCP PBS 1005 SS dated 15 May 2020, From PT IIS – Buatan I POM to PT IIS – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO638918, quantity 162,500 kg, transport by Fan/Pipe. - Delivery Form No. KCP PBS 1012 SS dated 31 Dec 2020, From PT IIS – Buatan I POM to PT IIS – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO638918, quantity 660,180 kg, transport by Fan/Pipe. - Delivery Form No. KCP PBS 1001 SS dated 31 Jan 2021, From PT IIS – Buatan I POM to PT IIS – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO638918, quantity 393,960 kg, transport by Fan/Pipe. <p>The information contain in the document are complete and can be presented either on a single document or across a range of documents.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding 	<p>PT. Inti Indosawit Subur – Buatan I POM not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is PT. Wijaya Multi Prima Lestari, CV Jasa Bersama and PT Buana Jaya Bersama.</p> <p>PT. Inti Indosawit Subur – Buatan I POM having legal ownership of</p>	<p>Complied</p>

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	<p>the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 	<p>material being transported by appointed outsourced companies: PT. Wijaya Multi Prima Lestari and CV Jasa Bersama.</p> <p>PT. Inti Indosawit Subur – Buatan I POM have a contract agreement with transporter as below:</p> <ul style="list-style-type: none"> - “Perjanjian Pengangkutan Nomor: 06/VIII/W MPL-IIS/2019” dated 2 August 2019 between PT Inti Indosawit Subur – Buatan I POM and PT Wijaya Multi Prima Lestari. Contract transport for CPO & PK. - “Perjanjian Pengangkutan Nomor: 05/VIII/JB-IIS/2019” dated 2 August 2019 between PT Inti Indosawit Subur – Buatan I POM and CV Jasa Bersama. Contract transport for CPO & PK. - “Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019” dated 2 August 2019 between PT Inti Indosawit Subur – Buatan I POM and PT Buana Jaya Bersama. Contract transport for CPO & PK. <p>Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 pont 1.k stated that “Transporter bersedia memenuhi persyaratan system sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor internal perusahaan dan auditor pihak eksternal dari badan sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan” – Transporter are willing to comply with certification system of RSPO Supply Chain during transport material and willing to be audit by internal auditor company (PT IIS – Buatan I POM) and external auditor from Certification Body if necessary.</p> <p>PT IIS Buatan I POM has a procedure to control the outsourced transporter through “SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019”</p> <p>Internal control for CPO and PK delivery by contractor has made as well with:</p>	
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		<ul style="list-style-type: none"> • Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time. • Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. • Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal. <p>Since January – December 2020 and January – February 2021 there is no CPO certified RSPO delivery by Buatan I POM. CPO delivery as ISCC certified. Sample seen on CPO delivery for CPO ISCC dated 17/02/2021:</p> <ul style="list-style-type: none"> - Surat Izin Pengisian CPO dated 17/02/2021, Vehicle Number: BM9257CU, Driver: Achmad S, Sim No. 0929***, Cargo: CPO. - DO No/BJB/50382, Vehicle Number: BM9257CU, Driver: Achmad S, Commodity: CPO, Delivery from Buatan I POM to Lubuk Gaung, signed by PT Buana Jaya Bersama - Daftar Periksa Kesiapan Pengiriman CPO dated 17/02/2021, Shift II, Vehicle Number BM9257CU, Driver: Achmad S, Before CPO load and After Load checking are Good and complete. <p>During onsite audit confirmed that control for CPO and PK delivery has well implemented by Buatan I Palm Oil Mill. Interview with CPO and PK transporter from PT Buana Jaya Bersama indicated that they have aware and controled by PT Inti Indosawit Subur – Buatan I POM.</p> <ul style="list-style-type: none"> • Interview with transporter PT Wijaya Multi Premier Lestari (operation director) conducted on 9 March 2021, it was confirmed that the transporter are aware regarding the 	
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		<p>requirement of RSPO supply chain during transport. Handling during transport are well control, before loading – during transport – unloading was monitor by supervisor. Tank transport are cleaning before loading and after unloading. GPS are installed in each tank truck to monitor during transport until reach the destination.</p>																					
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>PT Inti Indosawit Subur – Buatan I POM has recorded name and contact detail of all contractors, as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Name of Transporter</th> <th style="text-align: left;">PT Wijaya Multi Prima Lestari</th> <th style="text-align: left;">CV Jasa Bersama</th> <th style="text-align: left;">PT Buana Jaya Bersama</th> </tr> </thead> <tbody> <tr> <td>Initial Name</td> <td>WMPL</td> <td>JB</td> <td>BJB</td> </tr> <tr> <td>Address</td> <td>Jl. Prof M. Yamin No. 42A (Branch Office) Siak II Pekanbaru - Riau</td> <td>Jl. Siak 2 Palas KB 77 KM 15 Pekanbaru</td> <td>Jl. Siak II RT.02 RW. 03 Kec. Payung Sekaki Kel. Bandar Raya - Pekanbaru</td> </tr> <tr> <td>Contact Person</td> <td>Waty (Director)</td> <td>Suwito Djingga (Director)</td> <td>Eltono (Director)</td> </tr> <tr> <td>Telephone</td> <td>08117087***</td> <td>0811279***</td> <td>08217043***</td> </tr> </tbody> </table>	Name of Transporter	PT Wijaya Multi Prima Lestari	CV Jasa Bersama	PT Buana Jaya Bersama	Initial Name	WMPL	JB	BJB	Address	Jl. Prof M. Yamin No. 42A (Branch Office) Siak II Pekanbaru - Riau	Jl. Siak 2 Palas KB 77 KM 15 Pekanbaru	Jl. Siak II RT.02 RW. 03 Kec. Payung Sekaki Kel. Bandar Raya - Pekanbaru	Contact Person	Waty (Director)	Suwito Djingga (Director)	Eltono (Director)	Telephone	08117087***	0811279***	08217043***	Complied
Name of Transporter	PT Wijaya Multi Prima Lestari	CV Jasa Bersama	PT Buana Jaya Bersama																				
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Contact Person	Waty (Director)	Suwito Djingga (Director)	Eltono (Director)																				
Telephone	08117087***	0811279***	08217043***																				
3.8.11	<p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>	<p>The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019".</p>	Complied																				
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory</p>	<p>The organization has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p> <ul style="list-style-type: none"> - FFB delivery note - Weigbridge ticket for FFB receiving, CPO and PK delivery 	Complied																				

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	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<ul style="list-style-type: none"> - Delivery Order - Sales contract - Shipping Announcement - Mass balance report - Internal audit RSPO SCCS and Management review <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass Balance Report Buatan I POM" period 2019: January – March, April – June, July – September, October – December and period 2020: January – March, April – June, July – September, October – December.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p> <p>According to Mass balance Report, Buatan I POM only deliver Mass Balance sales from a positive stock.</p>	
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3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The organization is able to provided estimate volume of CPO and PK in a year period as in Budget FY2020/2021 Production FFB, CPO and PK. The organization also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT Inti Indosawit Subur – Buatan I POM.</p> <p>OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).</p> <p>The site has set OER for budget 2021 (Jan - Dec) as 19.38% and KER as 5.35%.</p> <p>Budget FFB process 2021: certified 98,600 MT, non certified: 189,165 MT</p> <p>Budget CPO 2021: certified 18,565 MT, non certified: 37,213 MT</p> <p>Budget PK 2021: certified 5,275 MT, non certified: 10,120 MT</p> <p>Previous Budget vs realization on 2020 (Jan – Dec) as below:</p> <table border="1" data-bbox="1131 909 1966 1348"> <thead> <tr> <th>Description</th> <th>Budget</th> <th>Realization</th> </tr> </thead> <tbody> <tr> <td>FFB Certified (MT)</td> <td>106,426.56</td> <td>67,414.02</td> </tr> <tr> <td>FFB Non Certified (MT)</td> <td>217,972.73</td> <td>183,344.60</td> </tr> <tr> <td>CPO Certified (MT)</td> <td>20,284.28</td> <td>12,200.60</td> </tr> <tr> <td>CPO Non Certified (MT)</td> <td>42,822.32</td> <td>34,795.98</td> </tr> <tr> <td>PK Certified (MT)</td> <td>5,693.82</td> <td>3,572.92</td> </tr> <tr> <td>PK Non Certified (MT)</td> <td>11,661.54</td> <td>9,702.04</td> </tr> <tr> <td>OER (%)</td> <td>19.45</td> <td>18.74</td> </tr> <tr> <td>KER (%)</td> <td>5.35</td> <td>5.29</td> </tr> </tbody> </table>	Description	Budget	Realization	FFB Certified (MT)	106,426.56	67,414.02	FFB Non Certified (MT)	217,972.73	183,344.60	CPO Certified (MT)	20,284.28	12,200.60	CPO Non Certified (MT)	42,822.32	34,795.98	PK Certified (MT)	5,693.82	3,572.92	PK Non Certified (MT)	11,661.54	9,702.04	OER (%)	19.45	18.74	KER (%)	5.35	5.29	Complied
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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT. Inti Indosawit Subur – Buatan I POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on "Laporan Harian Produksi" dated 28 February 2021, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from Buatan Estate: 14.40% b. For FFB from Buatan I Plasma: 17.79% c. For FFB from third-party: 17.88% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> a. For FFB from Buatan Estate: 5.16% b. For FFB from Buatan I Plasma: 5.15% c. For FFB from third-party: 5.17% <p>Budget vs Actual conversion ratios year 2020 from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from Buatan Estate: budget 17.98%, actual 17.50% b. For FFB from Buatan I Plasma: budget 18.90%, actual 18.23% c. For FFB from third-party: budget 18.80%, actual 18.08% 	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Buatan I POM implement Mass Balance Module. This indicator is not applicable.	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>iii) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after</p>	PT. Inti Indosawit subur – Buatan I POM has made shipping announcement inside PalmTrace transaction, sample seen for period January - December 2020:	Complied

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<p>dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>iv) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<table border="1"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>TR-3751c497-4e0e</td> <td>PT IIS - Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>575.42</td> <td>Confirmed</td> </tr> <tr> <td>TR-cc955448-d93e</td> <td>PT IIS - Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>132.8</td> <td>Confirmed</td> </tr> <tr> <td>TR-03cd1cea-eef6</td> <td>PT IIS - Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>669.07</td> <td>Confirmed</td> </tr> <tr> <td>TR-a4b2932f-cb4d</td> <td>PT IIS - Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>219.44</td> <td>Confirmed</td> </tr> <tr> <td>TR-e34b9304-8794</td> <td>PT IIS - Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>158.78</td> <td>Confirmed</td> </tr> <tr> <td>TR-d22fc925-2e72</td> <td>PT IIS - Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>393.46</td> <td>Confirmed</td> </tr> <tr> <td>TR-a1c7c1e9-e39b</td> <td>PT IIS - Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>219.44</td> <td>Confirmed</td> </tr> <tr> <td>TR-c991b928-43da</td> <td>PT IIS - Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>669.07</td> <td>Confirmed</td> </tr> <tr> <td>TR-de1a09d2-74e2</td> <td>PT IIS - Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>132.8</td> <td>Confirmed</td> </tr> <tr> <td>TR-4b3d5374-1d43</td> <td>PT IIS - Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>575.42</td> <td>Confirmed</td> </tr> </tbody> </table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status	TR-3751c497-4e0e	PT IIS - Buatan I KCP	CSPK	MB	575.42	Confirmed	TR-cc955448-d93e	PT IIS - Buatan I KCP	CSPK	MB	132.8	Confirmed	TR-03cd1cea-eef6	PT IIS - Buatan I KCP	CSPK	MB	669.07	Confirmed	TR-a4b2932f-cb4d	PT IIS - Buatan I KCP	CSPK	MB	219.44	Confirmed	TR-e34b9304-8794	PT IIS - Buatan I KCP	CSPK	MB	158.78	Confirmed	TR-d22fc925-2e72	PT IIS - Buatan I KCP	CSPK	MB	393.46	Confirmed	TR-a1c7c1e9-e39b	PT IIS - Buatan I KCP	CSPK	MB	219.44	Confirmed	TR-c991b928-43da	PT IIS - Buatan I KCP	CSPK	MB	669.07	Confirmed	TR-de1a09d2-74e2	PT IIS - Buatan I KCP	CSPK	MB	132.8	Confirmed	TR-4b3d5374-1d43	PT IIS - Buatan I KCP	CSPK	MB	575.42	Confirmed	<p>PT. Inti Indosawit Subur – Buatan I POM made remove RSPO certified CSPO from their PalmTrace account with volume remove: 15,532.92 MT CSPO and 5,789.75 MT CSPO; Stock removed for CSPO sold as ISCC certified. The evidence of remove transaction can be demonstrated on the palmtrace transaction during audit.</p> <p>During audit remote found non conformity as below:</p>
	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status																																																														
	TR-3751c497-4e0e	PT IIS - Buatan I KCP	CSPK	MB	575.42	Confirmed																																																														
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	TR-e34b9304-8794	PT IIS - Buatan I KCP	CSPK	MB	158.78	Confirmed																																																														
	TR-d22fc925-2e72	PT IIS - Buatan I KCP	CSPK	MB	393.46	Confirmed																																																														
	TR-a1c7c1e9-e39b	PT IIS - Buatan I KCP	CSPK	MB	219.44	Confirmed																																																														
	TR-c991b928-43da	PT IIS - Buatan I KCP	CSPK	MB	669.07	Confirmed																																																														
	TR-de1a09d2-74e2	PT IIS - Buatan I KCP	CSPK	MB	132.8	Confirmed																																																														
	TR-4b3d5374-1d43	PT IIS - Buatan I KCP	CSPK	MB	575.42	Confirmed																																																														

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		<p>According to transaction record in Palmtrace Buatan I POM confirmed that there were 2 transaction record with shipping announcement in the RSPO IT Platform made more than 3 month after Bill of Lading, i.e:</p> <ul style="list-style-type: none"> - BL date CSPK to Buatan I KCP dated 29/02/2020, volume 59.39 MT, Shipping announcement was made on 09/07/2020 - BL date CSPK to Buatan I KCP dated 31/03/2020, volume 449.66 MT, Shipping announcement was made on 09/07/2020 <p>PT Inti Indosawit Subur has made correction and corrective action to addressed the issue. Detail of correction and corrective action available at section 3.1 Details of Nonconformities. The NC has been Closed on 20 October 2020.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT. Inti Indosawit Subur – Buatan I POM has not made claims regarding the support of RSPO certified oil palm products. However the organization aware about the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Buatan I POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rsपो.org) • State that the member supports the work of the RSPO • State the member's history with regard to the RSPO. 	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), in its website:</p> <p>a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010."</p>	Complied

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	<ul style="list-style-type: none"> Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page. 	<p>b.Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website.</p> <p>c.State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010."</p> <p>d.State the member's history with regards to the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme."</p> <p>e.Use of RSPO Trademark to promote its membership of the RSPO: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such as website.</p>	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. It is clear that the statements are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Inti Indosawit Subur – Buatan I POM own products.	Not Applicable

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4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, PT. Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO Corporate Logo in any document.	Not Applicable
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Inti Indosawit Subur – Buatan I POM and their buyers.	Not Applicable
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	When confirming the sale of certified oil palm products, PT. Inti Indosawit Subur – Buatan I POM followed the requirements of the RSPO SCCS. PT. Inti Indosawit Subur – Buatan I POM stating the supply chain model and certificate number under which the claim is being made.	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	PT. Inti Indosawit Subur – Buatan I POM is not a distributor and/or wholesaler. Not applicable.	Not Applicable
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not	PT. Inti Indosawit Subur – Buatan I POM is not producing or selling end-product to consumer. No labelling on product whatsoever. Not applicable.	Not Applicable

	<p>be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>		
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>PT. Inti Indosawit Subur – Buatan I POM is not using product-specific claims in its CSPKO product. PT. Inti Indosawit Subur – Buatan I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p> <p>Not applicable.</p>	Not Applicable
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>PT. Inti Indosawit Subur – Buatan I POM is not using RSPO trademark and/or RSPO label. PT. Inti Indosawit Subur – Buatan I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p> <p>Not applicable.</p>	Not Applicable
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>PT. Inti Indosawit Subur – BUatan I POM is not using RSPO-certified on-pack claim. PT. Inti Indosawit Subur – Buatan I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p> <p>Not applicable.</p>	Not Applicable
6.4	<p>Business to consumer communication shall not include information about the claimant's RSPO membership status.</p>	<p>PT. Inti Indosawit Subur – Buatan I POM is not making any claim related to their RSPO membership status. PT. Inti Indosawit Subur – Buatan I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p> <p>Not applicable.</p>	Not Applicable

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6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	PT. Inti Indosawit Subur – Buatan I POM is not making any information about their supplier's RSPO membership status. PT. Inti Indosawit Subur – Buatan I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	PT. Inti Indosawit Subur – Buatan I POM is not using RSPO trademark and/or RSPO label. Not applicable.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	PT. Inti Indosawit Subur – Buatan I POM is not using RSPO trademark and/or RSPO label. Not applicable.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .	PT. Inti Indosawit Subur – Buatan I POM is retailers or food service company. Not applicable.	Not Applicable

MODULE B – MASS BALANCE SPECIFIC RULES

Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	PT Inti Indosawit Subur – Buatan I POM produce and sold the RSPO MB Certified 100%.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	There is no percentage of non-certified oil palm within the product RSPO MB.	Not Applicable
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). <p>In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document.</p>	PT Inti Indosawit Subur – Buatan I POM was not use labelling and trademark in their product.	Not Applicable

Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>PT Inti Indosawit Subur – Buatan I POM was not messaging in storytelling in product-related communications. It was verified during audit through sales contract, DO and dispatch slip (weighbridge card).</p>	<p>Not Applicable</p>
Principle 4: Respect community and human rights and deliver benefit			
Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>Buatan I POM and Eatate:</p> <p>The company has corporate policy set on 14 July 2020 by Group Manager (GM) PT Inti Indosawit Subur – Buatan Group, related “Kebijakan melarang adanya tindakan balas dendam, intimidasi dan pelecehan untuk pelapor/pembela hak asasi manusia” (Human Right Defender).</p> <p>The policy relating to human rights, is explained in point 13, stating that: “<i>The company respects human rights by treating all employees</i></p>	<p>Complied</p>

		<p><i>fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age". Thus, the management of PT IIS - Buatan Group protects against acts of revenge, intimidation and harassment for the reporter/human rights defender (Human Right Defender) in the area of PT Inti Indosawit Subur - Buatan Group.</i></p> <p>Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Group employees on 7-8 July 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 9-10 July 2020 which was attended by 25 stakeholders.</p> <p>Scheme Smallholder:</p> <p>Plasma Buatan I Plantation in each KUD or Cooperative has had organisation policy, for example: In Jaya Makmur Cooperative, the Cooperative Policy was established on 14 February 2020 and Sumber Rejeki Cooperative Policy was established on 16 February 2020, in which it contains the following:</p> <ol style="list-style-type: none"> 1) Compliance with regulation and law 2) Ethical behavior in business (prohibition of all forms of corruption, bribery, fraud in the use of funds and resources) 3) Environmental pollution 4) Occupational Health and Safety 5) Prohibition of the practice of burning land, peat areas and forest areas 6) Respect defenders without giving threats or intimidation 7) Respect human rights defenders without making threats or intimidationPrevents sexual harassment 	
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		<p>8) Respect human rights by treating employees and peasants fairly and does not differentiate between ethnicity, caste, religion, and gender.</p> <p>9) Prohibition of employing children under the age of 18 in every plantation operational activity.</p> <p>This policy has been socialized by the KUD/Cooperative each to all members, partners and surrounding communities, i.e In Sumber Rejeki Cooperative on 16 February 2020 which was attended by 20 participants. At the Jaya Makmur Cooperative on 14 February 2020 which was attended by 21 participants.</p> <p>The policy is also written in their farmer handbook "<i>Buku Panduan Petani</i>". The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p>	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	<p>Based on interview to all level of workers, contractors, scheme smallholders and stakeholders (Bukit Agung Village, Chief of Gender), its confirm that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>Until this recertification audit, there is no issue or case related to the acts of violence against the employees of the company.</p>	Complied
<p>Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>Buatan I POM and Eatate:</p> <p>Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-</p>	Complied

		<p>3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees. Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.</p> <p>The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. Disputes system which developed by unit of certification has follows the RSPO policy on respect for Human Right Defender (HRD).</p> <p>In example:</p> <ul style="list-style-type: none"> - The company has had a corporate policy set on 14 July 2020 by Group Manager (GM) PT Inti Indosawit Subur – Buatan Group, related “Kebijakan melarang adanya tindakan balas dendam, intimidasi dan pelecehan untuk pelapor/pembela hak asasi manusia” (Human Right Defender). <p>The policy relating to human rights, is explained in point 13, stating that: "The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age". Thus, the management of PT IIS - Buatan Group protects against acts of revenge, intimidation and harassment for the reporter/human rights defender (Human Right Defender) in the area of PT Inti Indosawit Subur - Buatan Group.</p> <p>Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Group employees on 7-8 July 2020 (list of</p>	
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		<p>participants can be shown) and on stakeholders (including local contractors) on 9-10 July 2020 which was attended by 25 stakeholders.</p> <ul style="list-style-type: none"> - SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013 was not refer to policy on respect for HRD. <p>Scheme smallholders:</p> <p>The scheme smallholders have a mechanism of consultation and communication in "Mekanisme Komunikasi, Konsultasi dan Keluhan", dated 3rd January 2011. The procedure has been communicated to all members on 10 January 2017 and also recorded into the "Buku Pinta" for each of farmer</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>Unit of Certification has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). The procedure is how to handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances is recorded in log Book and in "<i>Formulir Pencatatan Keluh Kesah dan Ketidakpuasan</i>". The company will endeavor to resolve complaints within 15 working days.</p> <p>These mechanisms has been communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities on January 2020. While for the internal parties (all level employees at PT Inti Indosawit Subur – Buatan Group has been communicated on 21-22 January 2020 (list of participants can be shown during audit). Through this communication, the company explained about the mechanism of submission of</p>	Complied

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		<p>complaints in detail and lasts in two directions (ask-answer/discussion), so if there are illiterate parties can understood.</p> <p>According to interview with management representatives and sustainability staff and also several of employees during the audit, there is no illiterate parties in estate, mill or scheme smallholders.</p>			
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>Buatan Estate and Mill</p> <p>Company has established a mechanism to handle complaint from external party, as written in “Mekanisme Penanganan Keluhan” – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under “Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan” – Employee’ complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees.</p> <p>Certificate holder has had new procedure namely <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower anonymity. Referring to Asian Agri’s website https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan.</p> <p><i>Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all related stakeholders such as land conflicts, social conflicts, human right issues, labor issues, etc.</i></p> <table border="1" data-bbox="1153 1292 1937 1332"> <tr> <td data-bbox="1153 1292 1601 1332">Internal Reporting:</td> <td data-bbox="1601 1292 1937 1332">Channel/Remarks</td> </tr> </table>	Internal Reporting:	Channel/Remarks	Complied
Internal Reporting:	Channel/Remarks				

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		<p><i>There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p>	<p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> 	
		<p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p>	<p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> <ul style="list-style-type: none"> • <i>Telephone: +62 811 910 7916</i> • <i>Email: attention@asianagri.com</i> 	
		<p><i>External Reporting:</i></p> <p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings. Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</i></p>	<p><i>Channel/Remarks</i></p> <ul style="list-style-type: none"> • <i>Email: grievance@asianagri.com</i> • <i>Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia</i> 	

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		<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p><i>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism.</i></p> <ul style="list-style-type: none"> • Fax: +62 21 230 1120 <li style="padding-left: 20px;">Attn.: Grievance Secretariat <p><i>Grievance submissions should be made using the Grievance Submission Form.</i></p> </div> <p>This procedure is also applied to scheme smallholder operational.</p> <p>The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations. The following grievance channels are available to support business transparency:</p> <p>The socialization of this procedure will be observed during onsite audit.</p> <p>Based on interviews with villagers around the plantation and related stakeholder (Plantation office and Environment Office of Pelalawan Regency) confirmed that there is no complaint raised during the last audit until this onsite Recertification audit.</p> <p>Scheme smallholders:</p> <p>The scheme smallholders have a mechanism of consultation and communication in "Mekanisme Komunikasi, Konsultasi dan Keluhan", dated 3rd January 2011. The procedure has been communicated to all members on November 2019 and also recorded into the "Buku Pintar" for each of farmer.</p>	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	<p>Based on interview with sustainability staff, stakeholders and representative of local communities, that there is no new land expansion since certificate issued. There is no land conflict between PT. Inti Indosawit Subur – Buatan Mill/Estate with other party including with surrounding village.</p> <p>Based on interviews with villagers around the plantation, Bukit Agung Village (Bpk. Parlaungan Panjaitan, related stakeholders (The</p>	Not Applicable

		plantation office and Environment Office of Pelalawan Regency on March 5, 2021, claimed that there were no complaints/disputes from the community around the plantation.	
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	<p>Buatan I POM, Eatate and Scheme Smallholder:</p> <p>PT IIS-Buatan Group has established a CSR program for the period 2020-2021, the determination of this CSR program is determined based on consultation/deliberation with the surrounding village community (village head) through the Deliberation of Plans and Development (Musrenbang Desa) in the period 2020-2021. MUSRENBANG – <i>Musyawarah Perencanaan Pembangunan</i> for the period of 2021 has been conducted in January 2021 (for village planning period in 2021) at the surrounding villages. Musrenbang is a discussion forum between villagers conducted to discuss the problems and potential of the village to be well identified to provide a clear direction for appropriate actions according to the scale of priorities and implemented in addressing the problem or maximizing the potential that has as the basis of the village government's work program to carry out budgeting and annual activities of the village.</p>	Complied
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	<p>Own Estate:</p> <p>PT. Inti Indosawit Subur – Buatan Estate has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No. AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement,</p>	Complied

		<p>involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD Sumber Rezeki and KUD Jaya Makmur, sampled smallholder member (farmer) and relevant authority, Plantation Agency of Pelalawan District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Buatan Estate and Scheme Smallholder:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p>	Complied
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>Buatan Estate and Scheme Smallholder:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood</p>	<p>Buatan Estate and Scheme Smallholder:</p>	

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	and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	Buatan Estate and Scheme Smallholders: The Company and scheme smallholders have "Hak Guna Usaha (HGU)/" Sertifikat Hak Milik (SHM)" Land title for smallholders. There is no customary land or legal rights within the company and scheme smallholdres area as the land originally was allocated as part of transmigration program. Based on documents review and interview with local government and local communities in surrounding of the company, it was noted there was no area/land that is under dispute.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	Buatan Estate and Scheme Smallholder: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Buatan Estate and Scheme Smallholder: Based on stakeholder consultation with communities surrounding the plantation, there has never been social unrest related to presence of occupied land.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	Buatan Estate and Scheme Smallholder: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.	Complied

<p>Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p>	<p>Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	Complied
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p>	<p>Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	Complied

4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	<p>Buatan Estate and Smalholder:</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	Complied
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	<p>Buatan Estate and Smalholder:</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	Complied
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	<p>Buatan Estate and Smalholder:</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p> <p>In addition, there is no new land acquisition done by PT Inti Indosawit Subur – Buatan I POM and its supply bases.</p>	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	<p>Buatan Estate and Smalholder:</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	Complied

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		In addition, there is no new land acquisition done by PT Inti Indosawit Subur – Buatan I POM and its supply bases.	
<p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p>Buatan I POM and Estate: PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders: Based on interview, KUD Jaya Makmur and KUD Sumber Rejeki, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders plots already have legal use rights Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and</p>	<p>Buatan I POM and Estate: PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary</p>	Complied

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	<p>implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p>	<p>rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD jaya Makmur and KUD Sumber Rejeki, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	
<p>4.6.3</p>	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p>	<p>Buatan I POM and Estate:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.</p>	<p>Complied</p>

4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.	<p>Buatan I POM and Estate: Based on stakeholder consultation, there is no expansion plan in business plan. There is no land conflict between PT. Inti Indosawit Subur – Buatan with other party including with surrounding village.</p> <p>Scheme smallholder: The Scheme Smallholder area of PT. Inti Indosawit Subur – Buatan falls in government program for “Perkebunan Inti Rakyat – Transmigrasi/PIR-Trans” as per “Keputusan menteri Transmigrasi No.Kep.90/MEN/1990 tentang Izin Pelaksanaan Transmigrasi PIR-Trans kepada PT. Inti Indosawit Subur I dengan Komoditas Kelapa Sawit di Lokasi Pangkalan Kuras, Kabupaten Kampar dan Pasir Penyau, Kabupaten Indragiri Hulu, Provinsi Riau” dated 29th July 1991.</p> <p>From this background, it was understood the scheme smallholder obtained the land ownership through government program PIR-Trans. Therefore it was not gone through compensation process to previous traditional landowners because the land was state land, free from ownership right. Currently, all scheme smallholder members have been granted with “Sertifikat Hak Milik/SHM” (land title) from “Badan Pertanahan Nasional /BPN”.</p>	Complied
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	<p>Buatan I POM and Estate: PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement,</p>	Complied

		<p>involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD Jaya Makmur and KUD Sumber Rejeki, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders plots already have legal use rights</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>Buatan I POM and Estate:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD Jaya Makmur and KUD Sumber Rejeki, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Smallholders land</p>	Complied

		<p>obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p> <p>Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>Buatan I POM and Estate:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD Jaya Makmur and KUD Sumber Rejeki, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p> <p>Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	Complied

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

4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	<p>Buatan I Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder's areas.</p> <p>All company plantation and scheme smallholder area have been issued with valid land title in the form of "<i>Hak Guna Usaha/HGU</i>" for company and "<i>Sertifikat Hak Milik</i>" for smallholder.</p> <p>Based on interview with member of KUD Sumber Rejeki, Farmer Group No. 67 and kavling No. 2009, 2125, 2048, 2046 and Farmer Group No. 68 kavling no. 2138, 2142, and 2146, the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.</p>	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	<p>Buatan Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder's areas.</p> <p>All company plantation and scheme smallholder area have been issued with valid land title in the form of "<i>Hak Guna Usaha/HGU</i>" for company and "<i>Sertifikat Hak Milik</i>" for smallholder.</p> <p>Based on interview with member of KUD Sumber Rejeki, Farmer Group No. 67 and kavling No. 2009, 2125, 2048, 2046 and Farmer Group No. 68 kavling no. 2138, 2142, and 2146, the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.</p>	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use	<p>Buatan Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no</p>	Complied

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	rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	<p>customary land or legal rights within the company and scheme smallholder's areas.</p> <p>All company plantation and scheme smallholder area have been issued with valid land title in the form of "<i>Hak Guna Usaha/HGU</i>" for company and "<i>Sertifikat Hak Milik</i>" for smallholder.</p> <p>Based on interview with member of KUD Sumber Rejeki, Farmer Group No. 67 and kavling No. 2009, 2125, 2048, 2046 and Farmer Group No. 68 kavling no. 2138, 2142, and 2146, the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.</p>	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	<p>Buatan Estate and Scheme Smallholders:</p> <p>Based on interview with surrounding village societies, local communities, field visit and verification of company documentation; there is no land dispute between company PT Inti Indosawit Subur or Buatan Smallholder and surrounding community.</p> <p>Land ownership status of Scheme Smallholder is granted by government program namely Transmigration Program since 1992 – 1995 (PIR - TRANS).</p>	Complied
<p>Principle 5: Support smallholder inclusion</p> <p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	<p>Based on interview with management representative ie. Public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the board of plasma or other FFB supplier. The actual prices also informed in front of mill gate.</p> <p>During onsite audit, Kebun Plasma Buatan/Scheme Smallholder has showed the FFB payment receipt period January 2021 in accordance with official FFB price that issued by FFB Pricing Team of Riau Province.</p>	Complied

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		All smallholder classified as up to 25 year which is the lower price due to the extraction that diminished. Sighted the payments record of KUD Jaya Makmur, Farmer Group/KT Panca Usaha period January 2021. All payments have been complied with the pricing that stipulated.	
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	<p>Based on document verification of Memorandum of Understanding (MoU) between the smallholders/KUD and PT Inti Indosawit Subur obtain information that the FFB pricing has followed the official FFB price stipulated by FFB Pricing Team of Riau Province. According to the local regulation in Riau Province, the FFB Price updated weekly (every 7 days). For example, minutes of meeting of FFB pricing meeting</p> <ul style="list-style-type: none"> • No: 46/TPH TBS-XI/2020 for period 18 – 24 November 2020. • No: 47/TPH TBS-XI/2020 for period 25 November – 1 December 2020. • No: 48/TPH TBS-XII/2020 for period 2 – 8 December 2020. • No: 49/TPH TBS-XII/2020 for period 9 – 15 December 2020. • No: 50/TPH TBS-XII/2020 for period 16 – 22 December 2020. <p>The FFB payments conducted monthly. For example, there was a receipt of FFB payments period of November 2020 on behalf of KUD Bhirawa Bakti and KUD Sumber Rejeki on 2 January 2021.</p> <p>Meanwhile, FFB pricing for independent supplier following the fluctuation of CPO pricing. Through the interview with FFB supplier of Sawit Jaya Mandiri (supplied to Buatan I POM) and CV Mandiri Sentosa PBD-R (supplied to Buatan II POM) obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3 days after the mill received the FFB. There is no dispute related to FFB payments so far.</p>	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Management of PT Inti Indosawit Subur – Buatan Group has had a commitment to share the RSPO premium price in accordance with the	Complied

		<p>agreement with their smallholder. Premium sharing is not distributed in the form of money but in the form of smallholder empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders.</p> <p>During this audit obtained information that the premium sharing for Buatan Plasma period 2020 has been handover on 10 December 2020. Buatan Plasma has held the training for smallholders namely "Alternative Income during Replanting Training" on November 2019 and January 2020 located in Bogor – Indonesia. Those training objectives is to prepare the smallholder to facing their monthly income situation during the replanting period.</p> <p>Based on interview with the smallholder’s representatives known that the training has given the positive insight to the smallholders to facing the replanting period. Some smallholders have prepared the alternative income during the replanting with other business such as quail farm, goat and cows and domestic waste composting.</p>	
5.1.4	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p>	<p>The smallholder’s member of Buatan Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Riau Province). Based on information obtained during the onsite audit known that some of smallholders’ member were women. The annual meeting of KUD always invited all members which is some women. All the decision made was involved the smallholder members, including women members.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p>	<p>Based on interview with management representative ie. Public affair staff, sustainability and plasma manager obtained information that all the contract is signed by both parties.</p> <p>Based on document all contract is written in Bahasa. For example: Contract with Plasma (KUD. Bhakti Mandiri and KUD Sejahtera) for supply FFB No.07/SPK-TBS/IIS-PT/XI/93 "Perjanjian Kerjasama antara Petani Peserta PIR-Trans dengan PT. Inti Indosawit Subur".</p>	Complied

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		Based on document review and interview with KUD confirmed that agreement between company and KUDs is made fairly, legal and transparent and have an agreed timeframe.	
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	Based on document verification sighted that monthly invoice for FFB payment contains data of price, weigh, deductions and amount paid are given. Buatan I POM also had a contract with independent FFB supplier. Based on interview with one of the FFB supplier namely Sawit Jaya Mandiri obtained information that the FFB payments area in line with the agreement. Usually, FFB payments paid not more than 3 days after the FFB received by mill. There was no payments dispute or issues so far.	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	According to the Indonesian regulation, verification of weigh bridge conducted annually. PT Inti Indosawit Subur – Buatan II Palm Oil Mill has 2 weighing equipment. During onsite audit sighted the record of validation from Trade and Industry Agency of Siak District as follows: <ul style="list-style-type: none"> • Validation Letter No: 510/DPP/UPTD-ML/SKHP/2020-IX/117 dated September 2020 for weighing equipment Avery Weight Tronix E1205 (capacity 50 MT). Valid until 11 February 2021. • Validation Letter No: 510/DPP/UPTD-ML/SKHP/2020-IX/118 dated September 2020 for weighing equipment Avery Weight Tronix E1205 (capacity 50 MT). Valid until 11 February 2021. During onsite audit confirmed that company has well maintained the weighing equipment.	Complied
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	Almost all smallholder surrounding PT Inti Indosawit Subur – Buatan I POM has been certified in the form of Scheme Smallholder under company certification. Based on review of agreement, the company carried out the development and provide supervision in KUD (Scheme Smallholder). The company support KUD in form of supervision in	Complied

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		<p>upkeep, fertilizer application, harvesting, FFB transport and implementation of RSPO P&C requirements.</p> <p>For other independent Smallholder, support are given in form of CSV (Create Share Value). Member of CSV which have cooperation with the company are Sutarno Kudin, Haluga, Samsuwar, Budi and Suhono. Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration. Those independent smallholders expected to be certified in next few years.</p>	
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p>	<p>Buatan Estate and Mill:</p> <p>Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees.</p> <p>Certificate holder has had new procedure namely <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower anonymity. Referring to Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan.</p> <p><i>Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all</i></p>	Complied

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		<p><i>related stakeholders such as land conflicts, social conflicts, human right issues, labor issues, etc.</i></p> <table border="1"> <thead> <tr> <th data-bbox="1133 435 1581 483">Internal Reporting:</th> <th data-bbox="1581 435 1953 483">Channel/Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1133 483 1581 834"> <p><i>There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p> </td> <td data-bbox="1581 483 1953 834"> <p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> </td> </tr> <tr> <td data-bbox="1133 834 1581 1050"> <p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p> </td> <td data-bbox="1581 834 1953 1050"> <p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> <ul style="list-style-type: none"> • <i>Telephone: +62 811 910 7916</i> • <i>Email: attention@asianagri.com</i> </td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th data-bbox="1133 1086 1581 1118">External Reporting:</th> <th data-bbox="1581 1086 1953 1118">Channel/Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1133 1118 1581 1382"> <p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct,</i></p> </td> <td data-bbox="1581 1118 1953 1382"> <ul style="list-style-type: none"> • <i>Email: grievance@asianagri.com</i> • <i>Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia</i> • <i>Fax: +62 21 230 1120 Attn.: Grievance Secretariat</i> </td> </tr> </tbody> </table>	Internal Reporting:	Channel/Remarks	<p><i>There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p>	<p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> 	<p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p>	<p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> <ul style="list-style-type: none"> • <i>Telephone: +62 811 910 7916</i> • <i>Email: attention@asianagri.com</i> 	External Reporting:	Channel/Remarks	<p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct,</i></p>	<ul style="list-style-type: none"> • <i>Email: grievance@asianagri.com</i> • <i>Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia</i> • <i>Fax: +62 21 230 1120 Attn.: Grievance Secretariat</i> 	
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		<p><i>corruption, harassment, criminal acts, environment, etc.</i></p> <p><i>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism.</i></p>	<p><i>Grievance submissions should be made using the Grievance Submission Form.</i></p>	
<p>This procedure is also applied to scheme smallholder operational. The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations. The following grievance channels are available to support business transparency: The socialization of this procedure will be observed during onsite audit. Scheme smallholders: The scheme smallholders have a mechanism of consultation and communication in "Mekanisme Komunikasi, Konsultasi dan Keluhan", dated 3rd January 2011. The procedure has been communicated to all members on November 2019 and also recorded into the "Buku Pintar" for each of farmer member.</p>				
<p>Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>				
5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p>	<p>Buatan I POM and Estate: PT Inti Indosawit Subur – Buatan I POM has consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. PT IIS has collaborated with smallholders around plantations and is incorporated in the CSV (Create Share Value) Program, namely: Sawit Jaya Mandiri</p>		Complied

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		<p>Association with an area of 832 ha located in SP2, SP4 and SP6 village with a total of 13 farmer groups.</p> <p>Based on an interview with the person in charge of the Buatan Group CSV (Mr. Achmad Roziqin Budi Santoso), a consultation with farmers was held on February 13, 2020, which was attended by 16 farmers and the head of the farmer group, that there are some expectations of the farmers, including:</p> <ul style="list-style-type: none"> - FFB prices are relatively stable - Assistance in developing BMP in increasing production - Assistance in maintaining production road access to the factory for smooth delivery of FFB to the mill <p>The PT IIS CSV team has provided guidance to smallholder farmers by conducting several training activities, including:</p> <ul style="list-style-type: none"> - Training related to fertilizer use on February 26, 2020 was attended by 232 farmers - Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14 2018 and the last was conducted on 10 February 2020. 	
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p>	<p>PT IIS has collaborated with smallholders around plantations and is incorporated in the CSV (Create Share Value) Program, namely: Sawit Jaya Mandiri Association with an area of 832 ha located in SP2, SP4 and SP6 village with a total of 13 farmer groups.</p> <p>In 2021 there is a program to increase the area of CSV area of 140 Ha located in SP4 and SP6. The Company has settled the CSV development program for the period 2020, the realization of the program until December 2020 is as follows:</p> <ul style="list-style-type: none"> - Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14 2018. 	Complied

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		<ul style="list-style-type: none"> - Independent Smallholder Coordination Meetings are held 2 times a year, the last being on February 13, 2020 - Harvest counseling to farmers on February 13, 2020 - Education related to the prevention of Covid-19 on April 17, 2020 - Provided assistance to farmers for road maintenance in the form of providing 383 tons of gravel. - Counseling on Making Appeal Signborads, in October 2019 - Assistance for the procurement of owl (<i>Tyto alba</i>) barn (KBH: kandang Burung Hantu) on August 15, 2019 - Road Repair Assistance in November 2020 - Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14, 2018 and the last was conducted on 10 February 2020. <p>PT IIS has realized some smallholder expectation, including:</p> <ul style="list-style-type: none"> - Production facility assistance in the form of fertilizer procurement as much as 346 tons with payment made by credit for 6 months. - Repair of production roads and axle roads along 6 km, Providing assistance to farmers for road maintenance in the form of providing 383 tons of gravel material. - Planting the Host Plan as many points for pest and disease control - Installation of 5 units of owl cages for rat pest control. <p>The PT IIS CSV team has provided guidance to smallholder farmers by conducting several training activities, including:</p> <ul style="list-style-type: none"> - Training related to fertilizer use on February 26, 2020 was attended by 232 farmers - Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14 2018 and the last was conducted on 10 February 2020. 	
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		<p>In supporting the legality of smallholder land, PT IIS has provided assistance in the effort to process the legality of farmers' land to obtain a Freehold Certificate (SHM), until December 2020 the SHM certificates that have been owned by farmers are as follows:</p> <ul style="list-style-type: none"> - Already have Certificate of SHM (<i>Sertifikat Hak Milik</i>): 106 Ha (12,7%) - Has a Village Letter (SKT/SKGR): 726 Ha (87,3%) 	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>In supporting the legality of smallholder land, PT IIS has provided assistance in the effort to process the legality of farmers' land to obtain a Freehold Certificate (SHM), until December 2020 the SHM certificates that have been owned by farmers are as follows:</p> <ul style="list-style-type: none"> - Already have Certificate of SHM (<i>Sertifikat Hak Milik</i>): 106 Ha (12,7%) - Has a Village Letter (SKT/SKGR): 726 Ha (87,3%) <p>For independent Smallholder, support are given in form of CSV (Create Share Value). Member of CSV which have cooperation with the company are Sawit Jaya Mandiri (SJM). Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration. Those independent smallholders expected to be certified in next few years.</p> <p>PT IIS already has a program to carry out a land legality process in collaboration with the Sawit Jaya Mandiri Association through the PRONA-PTSL (Complete Systematic Land Registration) program covering an area of 106 hectares.</p>	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>PT IIS - Buatan Group has created a training program especially related to the handling/use of herbicides and pesticides for plasma farmers:</p> <ul style="list-style-type: none"> - Training on 18 September 2019; Limited Pesticides and K3 training, attended by 26 farmers from KUD Birawa Bakti. 	Complied

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		<ul style="list-style-type: none"> - March 28, 2019; Limited herbicide and K3 training / extension, attended by 22 participating farmers from KUD Mulus Rahayu. - March 29, 2019; limited pesticide training and K3, attended by 23 plasma farmers from KUD Kebun Sawit Harapan. <p>In the 2020 period, the training program in plasma experienced problems with the Covid-19 pandemic, so that the counseling method was not carried out with a group of farmers but individually (per farmer) by plasma assistants.</p>	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Buatan I POM and Estate:</p> <p>PT IIS has a smallholder who cooperates and is incorporated in the CSV (Create Share Value) Program, namely: Sawit Jaya Mandiri Association with an area of 832 ha located in SP2, SP4 and SP6 with a total of 13 farmer groups. The target of establishing CSV PT IIS Buatan I in 2020 is an area of 1,269 ha and until December 2020 has been realized an area of 832 ha or has reached 66%.</p> <p>The target for the formation of CSV PT IIS Buatan Group in 2020 is an area of 1,269 hectares and as of December 2020 has realized an area of 832 hectares or has reached 66%. In 2021 there is a program to increase the CSV area of 140 hectares located in SP4 and SP6.</p> <p>Based on the results of the CSV report review for the period of 2021 are as follows:</p> <ul style="list-style-type: none"> - Based on the progress report on the achievement of the CSV program for the 2020 period, the area of the CSV program at PT IIS - Buatan Group has reached 832 Ha. - There are 4 farmer groups that are no longer active again with a total area of 586 hectares, namely the Sei Minai Farmer Group covering 100 hectares, the Rimba Cempedak Farmer Group covering an area of 117 hectares, the Manunggal Farmer Group covering an area of 85 hectares and the Brotherhood Farmer 	Complied

		<p>Group covering an area of 285 hectares. Both farmer groups have been eliminated from the CSV program in 2020.</p> <ul style="list-style-type: none"> - The plan for 2021 will increase the area of 140 ha in the Sawit Jaya Mandiri Farmer Group to an area of 290 ha 	
<p>Principle 6: respect workers’ rights and conditions Protect workers’ rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>			
<p>6.1.1</p>	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>PT Inti Indosawit Subur has established the Company Policy on Equal Opportunities as documented in “Kebijakan Perusahaan”, dated 1st December 2014: “Memperlakukan seluruh karyawan secara adil, baik dalam hal penerimaan, penilaian kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal Negara, agama/kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur” - to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age. The policy has communicated to all workers in Buatan I Estate, last socialization conducted on 12 and 15 February 2020.</p> <p>Group Manager has established the ICS Policy under “Kebijakan Group Manager” dated 2nd January 2018, that was signed by Manajer Group ICS Buatan, in point 9 was mentoned “Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur” – to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union</p>	<p>Complied</p>

		affiliation, political affiliation or age. The Policy has communicated to all smallholder member.	
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.	Based on interview during onsite audit, workers were aware if there any cases of discrimination, e.g. document review of salary payment month November and December 2020, there was not find any evidence of discrimination. The workers and groups including local communities, women, and migrant workers have not been discriminated against	Complied
6.1.3	The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	PT Inti Indosawit Subur – Buatan POM demonstrated the commitment that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness. Such as: <ul style="list-style-type: none"> - The company has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation. - In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness. - Job opportunities were communicated and given to surrounding villagers at first priority where no discrimination found observed during interview and related records of workers being employed. All workers has treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has evaluated by the organisation as described in criterion 2.1. Annuals performance evaluation result of worker has shown. - All discrimination has prohibited for all area in estate and mill. PKB also mentioned ban of discrimination for all workers in the organization. Procedure for worker recruitment (SDM-A-001-00) 	Complied

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		and procedure for employee assessment (HRD C- 002-00) was available and mentioned there was no discrimination treatment during recruitment and promotion process. Promotion of worker will be done base on work period, annual evaluation result, and availability of position.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	<p>PT Inti Indosawit Subur – Buatan Group prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Buatan I POM has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted on 3 October 2020, 7 November 2020 and 5 December 2020. All the female sprayer in well condition and not being pregnant nor breast feeding. E.g: Employee code: 0907 (Mrs El*j*), 07137 (Mrs D*r**n S**g**n)</p>	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	<p>A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>PT Inti Indosawit Subur – Buatan I POM has implemented the policy related to protection reproductive right; such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator.</p> <p>All female worker in sprayer team and fertilizer team shall join pregnancy test in company clinic, once a month.</p> <p>Regular gender committee meeting on 3-monthly basis with focus to communicating roles and responsibilities for gender committee, understanding the definition of sexual harassment in workplace. Communicating specific grievance mechanism to handle and resolve</p>	Complied

		sexual harassment case.	
6.1.6	There is evidence of equal pay for the same work scope.	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>Company has stated the wages for workers base on Decree of Keputusan Gubernur Riau No. Kpts. 61198/XI/2019”, dated 21/11/2019 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,002,383.89/month.</p> <p>The company composes the structure and scale of the 2020 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the amount of wages for permanent workers (SKU-B) based on class, rank/position.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/04/2020, dated 12 January 2020; regarding: “Kenaikan Upah Pekerja Golongan SKUB” and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and AKU-B). The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.</p> <p>As for the period of 2021 wage determination has not changed from 2020, namely based on the Decree of the Governor of Riau Year 2021 No. Kpts.1581/XI/2020 dated November 20, 2020. The amount of basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,002,383.89 per month.</p>	Complied
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			

<p>6.2.1</p>	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p>	<p>Buatan I POM and Estate:</p> <p>The company have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Manpower on 4 July 2018. The renewal of PKB or working agreement for 2021 – 2023 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan".</i></p> <p>The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.</p> <p>The application of wages for daily/temporary employees (PHL and</p>	<p>Complied</p>
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		<p>PKWT) has been explained in the Daily Worker Agreement, in Article 4 on Wages and Payments, states: "The Parties agree that the wages received by the Second Party (Worker) per work day are the wages currently in force for the First Party in accordance with Provincial UMP is IDR 112,800 per working day.</p> <p>Determination of wage for period 2020 is based on Decree of Gubernur Riau SK no. KPTS 599/III/2020, dated 18 March 2020; regarding: "Penetapan Upah Minimum Sektoral Perkebunan Provinsi Riau Tahun 2020" amount of IDR 3,020,000.</p> <p>As for the period of 2021 wage determination has not changed from 2020, namely based on the Decree of the Governor of Riau Year 2021 No. Kpts.1581/XI/2020 dated November 20, 2020. The amount of basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,002,383.89 per month.</p> <p>Taken sample of salary slip for period May - June 2020. Based on sample salary slip, confirmed that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees.</p> <p>Payroll on Januari 2021 period</p> <p><u>Buatan I Mill:</u></p> <ol style="list-style-type: none"> 1. Mr. Muh. Ik***n (BHL-Daily worker); Day of Work: 20 days <ul style="list-style-type: none"> - Basic salary IDR 2,416,000; - Process premium IDR 3,438,960; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 5,752,536. 2. Mr. A. Ak**r (BHL- Daily worker) 	
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		<p>Day of Work: 19 days</p> <ul style="list-style-type: none"> - Basic salary IDR 2,295,200; - Over Time IDR 1,702,022; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 3,894,798. <p><u>Buatan I Estate:</u></p> <p>3. Mr. Gu****n (BHL-Daily worker);</p> <p>Day of Work: 20 days</p> <ul style="list-style-type: none"> - Basic salary IDR 2,416,000; - Premium IDR 1,043,564; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 3,357,140. <p>4. Mr. Su****o (BHL-Daily worker);</p> <p>Day of Work: 16 days</p> <ul style="list-style-type: none"> - Basic salary IDR 1,932,800; - Premium IDR 2,194,046; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 4,024,422. <p>Based on the sample pay slip above, that Buatan I Estate and Buatan I Mill have applied the wages of their employees in line with Law No. 13 of 2003 on Employment.</p> <p>Scheme Smallholder</p> <p>The application of employee harvest and fertilizer wages in Plasma Buatan I is based on Decree of Gubernur Riau SK No.</p>
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		<p>Kpts.1581/XI/2020 dated November 20, 2020; regarding: "Penetapan Upah Minimum Sektor Perkebunan Provinsi Riau Tahun 2021" amount of IDR 3,002,383.89 and also state on working agreement letter - "Surat Perjanjian Kerjasama", i.e: Working Agreement Letter on behalf of Mr. Budi (as Harvester) at Jaya Makmur Cooperative dated 2 December 2019. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p> <p>Determination of wages in the period 2021, until this audit was conducted there has been no decision from the Governor of Riau, so the wage period in 2021 at PT IIS - Buatan Group still uses UMSK in 2020. However, if the minimum wage decision for the period 2021 has been determined by the Governor of Riau, then PT IIS-Buatan Group will conduct "<i>Rapel</i>". However, as for the period of 2021 wage determination has not changed from 2020, namely based on the Decree of the Governor of Riau Year 2021 No. Kpts.1581/XI/2020 dated November 20, 2020. The amount of basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,002,383.89 per month.</p> <p>Meanwhile, for fertilizer sowing workers, the work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 12,500 per sack. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, sample taken:</p> <ul style="list-style-type: none"> • Harvesters on behalf of Sugeng for the harvest on Rustamari field period December 2020, for harvesting FFB: 3 rotation : 3100 kg 	
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		<p>FFB with wages of IDR 150 per kg, total wages of IDR 465,000</p> <ul style="list-style-type: none"> Harvesters on behalf of Ibnu for the harvest on Abdul Muhsin field period December 2020, for harvesting FFB: 3 rotation : 3600 kg FFB with wages of IDR 150 per kg, total wages of IDR 540,000. <p>Fertilizer wages in Jaya Makmur Cooperative on behalf of Rustamari for the period December 2020, the type of Dolomite fertilizer is 513 kg, so the amount of wages received is IDR 128,250.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>Buatan I POM and Estate:</p> <p>The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: "<i>Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan</i>".</p> <p>Determination of wages (including benefits and other benefit/premium), working hours (including hours and overtime pay)</p>	Complied

		<p>and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah</i> - Wages, which explains:</p> <ul style="list-style-type: none"> a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations c) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>The certification holder has made a salary slip for his employees, which is explained in detail, including: basic wages, fixed and premium (harvest and non-harvest) allowances, overtime pay, health and retirement benefits, and deductions that include contributions of labor security and health insurance.</p> <p><u>Data Verified:</u> Payroll on Januari 2021 period <u>Buatan I Mill:</u></p>	
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		<p>1. Mr. Muh. Ik***n (BHL-Daily worker); Day of Work: 20 days</p> <ul style="list-style-type: none"> - Basic salary IDR 2,416,000; - Process premium IDR 3,438,960; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 5,752,536. <p>2. Mr. A. Ak**r (BHL- Daily worker) Day of Work: 19 days</p> <ul style="list-style-type: none"> - Basic salary IDR 2,295,200; - Over Time IDR 1,702,022; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 3,894,798. <p><u>Buatan I Estate:</u></p> <p>3. Mr. Gu****n (BHL-Daily worker); Day of Work: 20 days</p> <ul style="list-style-type: none"> - Basic salary IDR 2,416,000; - Premium IDR 1,043,564; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 3,357,140. <p>4. Mr. Su****o (BHL-Daily worker); Day of Work: 16 days</p> <ul style="list-style-type: none"> - Basic salary IDR 1,932,800; - Premium IDR 2,194,046; 	
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		<ul style="list-style-type: none"> - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 4,024,422. <p>Scheme Smallholder</p> <p><u>Buatan I Plasma:</u></p> <p>5. Mr. E. Su***d (SKUH-Fixed worker); Day of Work: 25 days</p> <ul style="list-style-type: none"> - Basic salary IDR 2,397,925; - Fringe Benefits IDR 479,925; - Premium IDR 400,000; - Deductions: IDR 120,677; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 3,156,833. <p>The application of employee harvest and fertilizer wages in Plasma Buatan I is based on Decree of Gubernur Riau SK No. Kpts.1581/XI/2020 dated November 20, 2020; regarding: "Penetapan Upah Minimum Sektor Perkebunan Provinsi Riau Tahun 2021" amount of IDR 3,002,383.89 and also state on working agreement letter - "<i>Surat Perjanjian Kerjasama</i>", i.e: Working Agreement Letter on behalf of Mr. Budi (as Harvester) at Jaya Makmur Cooperative dated 2 December 2019. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p> <p>Determination of wages in the period 2021, until this audit was conducted there has been no decision from the Governor of Riau, so the wage period in 2021 at PT IIS - Buatan Group still uses UMSK in</p>	
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		<p>2020. However, if the minimum wage decision for the period 2021 has been determined by the Governor of Riau, then PT IIS-Buatan Group will conduct "<i>Rapel</i>". However, as for the period of 2021 wage determination has not changed from 2020, namely based on the Decree of the Governor of Riau Year 2021 No. Kpts.1581/XI/2020 dated November 20, 2020. The amount of basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,002,383.89 per month.</p> <p>Meanwhile, for fertilizer sowing workers, the work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 12,500 per sack. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, i.e:</p> <p><u>Data Verified:</u></p> <ul style="list-style-type: none"> • Harvesters on behalf of Rustamari for the harvest period February 2021, for Harvesters on behalf of Sugeng for the harvest on Rustamari field period December 2020, for harvesting FFB: 3 rotation : 3100 kg FFB with wages of IDR 150 per kg, total wages of IDR 465,000 • Harvesters on behalf of Ibnu for the harvest on Abdul Muhsin field period December 2020, for harvesting FFB: 3 rotation : 3600 kg FFB with wages of IDR 150 per kg, total wages of IDR 540,000. • Fertilizer wages in Jaya Makmur Cooperative on behalf of Rustamari for the period February 2021, the type of Dolomite fertilizer is 513 kg, so the amount of wages received is IDR 128,250. <p>The company gives salary slips to all employees the day before</p>	
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		<p>payday, The salary slip is also written on the number of workdays of employees, example of salary slips can be seen in 6.1.6 above.</p>	
<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>Buatan I POM and Estate:</p> <p>The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan"</i>.</p> <p>Determination of wages (including benefits and other benefit/premium), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah - Wages</i>, which explains:</p> <ul style="list-style-type: none"> a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and 	<p>Complied</p>

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		<p>Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations</p> <p>c) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions.</p> <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>Based on the sample pay slip above, that Buatan I Estate and Buatan I Mill have applied the wages of their employees in line with Law No. 13 of 2003 on Employment.</p> <p>Scheme Smallholder</p> <p>The application of employee harvest and fertilizer wages in Plasma Buatan I is based on Decree of Gubernur Riau SK No. Kpts.1581/XI/2020 dated November 20, 2020; regarding: "Penetapan Upah Minimum Sektor Perkebunan Provinsi Riau Tahun 2021" amount of IDR 3,002,383.89 and also state on working agreement letter - "<i>Surat Perjanjian Kerjasama</i>", i.e: Working Agreement Letter on behalf of Mr. Budi (as Harvester) at Jaya Makmur Cooperative dated 2 December 2019. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p>	
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		<p>Determination of wages in the period 2021, until this audit was conducted there has been no decision from the Governor of Riau, so the wage period in 2021 at PT IIS - Buatan Group still uses UMSK in 2020. However, if the minimum wage decision for the period 2021 has been determined by the Governor of Riau, then PT IIS-Buatan Group will conduct "<i>Rapel</i>". However, as for the period of 2021 wage determination has not changed from 2020, namely based on the Decree of the Governor of Riau Year 2021 No. Kpts.1581/XI/2020 dated November 20, 2020. The amount of basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,002,383.89 per month.</p> <p>Meanwhile, for fertilizer sowing workers, the work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 12,500 per sack. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, i.e:</p> <p><u>Data Verified:</u></p> <ul style="list-style-type: none"> • Harvesters on behalf of Rustamari for the harvest period March 2020, for harvesting FFB: rotation 1: 1250 kg FFB, rotation 2: 1460 kg FFB and rotation 3: 1700 kg FFB with wages of IDR 150 per kg, total wages of IDR 661.5500 • Fertilizer wages in Jaya Makmur Cooperative on behalf of Rustamari for the period March 2020, the type of Dolomite fertilizer is 513 kg, so the amount of wages received is IDR 128,250. <p>Based on verification of the data above, that the company has applied wages to its employees in accordance with Decree of the Governor of Riau Year 2021 No. Kpts.1581/XI/2020 dated November 20, 2020.</p>	
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		<p>The amount of basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,002,383.89 per month.</p>	
<p>6.2.4</p>	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>Buatan I POM and Estate: PT Inti Indosawit Subur – Buatan I Group has provided adequate housing, water supplies, medical, educational and welfare amenities to national standards or above. The facilities, such as:</p> <ul style="list-style-type: none"> • Housing complex (399 units); • Elementary (1 unit) and kindergarden (1 units); • Polyclinic (1 unit); • Mosque (2 units); • Church (1 unit); • Creche (1 units); • School bus (2 units); • Ambulance (1 unit); <p>PT Inti Indosawit Subur has also prepared budget for employee housing improvements every year. The budget has been distributed based on cash flow / detailing every month for a year. The company has also provided clean water for MCK (<i>Mandi Cuci Kakus</i> - not for drink) that is sourced from underground wells and has complied with applicable regulatory standards. The provision of electricity for employee housing is provided by using electricity connections from the government (PLN - <i>Perusahaan Listrik Negara</i>).</p> <p>Scheme Smallholders: All workers in Plasma Buatan has own house with water and electricity supplies from government (PLN). Based on interview with smallholder</p>	<p>Complied</p>

		in explained that the worker has their own house in the village, and they are satisfied with the condition.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Buatan I POM and Estate: PT Inti Inti Indosawit Subur – Buatan Group has demonstrated an effort to improve worker's access to adequate, sufficient and affordable food.</p> <p>The company provides minimarket which managed by the cooperative and traditional market is nearby surrounding company area, mostly goods needed by employees is provided by the minimarket and cooperative. Price in minimarket and cooperative was affordable and cheaper than traditional market nearby company area. Price control by cooperative and all member including workers and company management.</p> <p>Scheme smallholders: There is a market in the village where smallholder workers stay. Access road and the availability of foods and other basic needs was easy to found with competitive price/affordable. Price determined by the market and control by government.</p>	Complied
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	<p>Buatan I POM, Estate and Scheme Smallholder: Determination of wage for period 2020 is based on Decree of Gubernur Determination of wages in the period 2021, until this audit was conducted there has been no decision from the Governor of Riau, so the wage period in 2021 at PT IIS - Buatan Group still uses UMSK in 2020. However, if the minimum wage decision for the period 2021 has been determined by the Governor of Riau, then PT IIS-Buatan Group will conduct "<i>Rapel</i>". However, as for the period of 2021 wage determination has not changed from 2020, namely based on the Decree of the Governor of Riau Year 2021 No. Kpts.1581/XI/2020 dated November 20, 2020. The amount of basic wage based on the</p>	Complied

		<p>decision letter for Pelalawan Regency amounted to IDR 3,002,383.89 per month.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/04/2020, dated 12 January 2020; regarding: "Kenaikan Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Tenaga kerja and Kesehatan) and deduction.</p> <p>The certificate holder PT IIS - Buatan Group has set the structure of the employee wage scale for the 2020-2021 period set on June 4, 2020, as follow:</p> <p>List of Employees Wage Structure PT IIS – Buatan Group 2020-2021 Period</p>	
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Daftar Upah Pekerja PHL							
Plantation 2 -Riau							
2020							
NO	PT	UNIT	UPAH 2019	KENAIKAN 2020	UPAH 2020	UPAH/HARI	KETERANGAN
1	PT. IIS	KUK	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
2	PT. IIS	KSA	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
3	PT. IIS	KSL	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
4	PT. IIS	KLU	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
5	PT. IIS	PUS	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
6	PT. IIS	PUD	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
7	PT. IIS	KBN	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
8	PT. IIS	KSP	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
9	PT. IIS	KLB	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
10	PT. IIS	KVB	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
11	PT. IIS	KBN-K	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
12	PT. IIS	PBS	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
13	PT. IIS	PBD	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
14	PT. IIS	KGS	2,820,000	225,451	3,045,451	121,818	UMK KUANSING 2020
15	PT. IIS	PSP	2,820,000	225,451	3,045,451	121,818	UMK KUANSING 2020
16	MUP	KST	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
17	MUP	KPR	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
18	MUP	KGD	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
19	MUP	PSG	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
20	MUP	PPR	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
21	RAU	KPN	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
22	RAU	KLP	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
23	RAU	PPN	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
24	TYE	KTZ	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
25	TYE	KSG	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020
26	TYE	PTZ	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020

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Daftar Upah Pekerja SKU-H								Natura 15kg (9.500/kg)	
Plantation 2 -Riau								142,500	
2020									
NO	PT	UNIT	UPAH 2019	KENAIKAN 2020	UPAH 2020	UPAH/HARI	KETERANGAN	Nilai upah (Uang + Beras)	
1	PT. IIS	KJK	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
2	PT. IIS	KSA	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
3	PT. IIS	KSL	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
4	PT. IIS	KLU	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
5	PT. IIS	PUS	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
6	PT. IIS	PUD	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
7	PT. IIS	KBN	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
8	PT. IIS	KSP	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
9	PT. IIS	KLB	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
10	PT. IIS	KVB	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
11	PT. IIS	KBN-K	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
12	PT. IIS	PBS	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
13	PT. IIS	PBD	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
14	PT. IIS	KGS	2,679,000	223,951	2,902,951	96,765	UMK KUANSING 2020	3,045,451	
15	PT. IIS	PSP	2,679,000	223,951	2,902,951	96,765	UMK KUANSING 2020	3,045,451	
16	MUP	KST	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
17	MUP	KPR	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
18	MUP	KGD	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
19	MUP	PSG	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
20	MUP	PPR	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
21	RAU	KPN	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
22	RAU	KLP	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
23	RAU	PPN	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
24	TYE	KTZ	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
25	TYE	KSG	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	
26	TYE	PTZ	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	3,020,000	

The company also made calculations related to prevailing wage, based on the wages given to employees as costs given by the company:
 Following is included in the calculation:

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In Kind Benefits	Total Kebun
Housing (Cost of Building :30 years)+(Annual Maintenance:Number of houses):12 Months	262.357
Electricity & Water (Annual Cost of Water & Electricity ÷ Number of Houses) ÷ 12 months	61.435
Education [(total costs not including teacher and non teacher labour costs + school transport + school building maintenance + food for children ÷Number of Workers] ÷ 12 months	74.284
Creche Facilities (TPA) (building maintenance + food for children +supplies+ Caretaker costs) ÷ Number of Workers	13.959
Healthcare (Kesehatan) (maintenance of clinic, medicines & medical materials, ambulance transport costs + Cost of Healthcare Workers) ÷ Number of Workers	465
Food	120.567
Sport & Recreation Fac.	3.446
Total Cost of In Kind Benefits	536.512
Average Monthly Take Home Salary per Worker	2.587.593
Total Value of Prevailing Wage	3.124.105

PROCEDURAL NOTE:

The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.

In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:

1. Payment of minimum wages in accordance with applicable regulations
2. Assessment of wages paid (prevailing wages) and in-kind benefits.

Once the DLW benchmark is available, this procedural note is no longer applicable.

<p>6.2.7</p>	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p>	<p>Buatan I POM and Estate: Based on the vrification of employee data documents for the period of December 2020, PT IIS has permanent and non-permanent employees (daily workers), up to December 2020 employee data is as follows: Buatan I Estate:</p> <table border="1"> <thead> <tr> <th>Status</th> <th>Number of Workers</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>SKUH</td> <td>146</td> <td>32%</td> </tr> <tr> <td>SKUB</td> <td>42</td> <td>6%</td> </tr> <tr> <td>BHL</td> <td>251</td> <td>63%</td> </tr> <tr> <td>Total</td> <td>439</td> <td>100%</td> </tr> </tbody> </table> <p>Buatan I POM:</p> <table border="1"> <thead> <tr> <th>Status</th> <th>Number of Workers</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>SKUH</td> <td>71</td> <td>52%</td> </tr> <tr> <td>SKUB</td> <td>42</td> <td>40%</td> </tr> <tr> <td>BHL</td> <td>7</td> <td>8%</td> </tr> <tr> <td>Total</td> <td>120</td> <td>100%</td> </tr> </tbody> </table> <p>Note: SKUH (Syarat Kerja Umum Harian) – Permanent workers 1 SKUB (Syarat Kerja Umum Bulanan) – Permanent Workers 2 BHL (Buruh harian Lepas) – Non permanent workers</p> <p>Buatan I POM: until December 2020, there are 7 employees with the PHL (daily worker). The company has identified that it is related to the main work in oil palm plantations based on Circular Letter from GAPKI dated 073/GAPKI/II 2013 concerning Circular for the Flow of Work Implementation Process Activities in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and product</p>	Status	Number of Workers	Percent	SKUH	146	32%	SKUB	42	6%	BHL	251	63%	Total	439	100%	Status	Number of Workers	Percent	SKUH	71	52%	SKUB	42	40%	BHL	7	8%	Total	120	100%	<p>Complied</p>
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		<p>processing activities, the rest are supporting activities in accordance with Permenakertrans No. 19/2012 whose implementation can be left to other parties.</p> <p>Based on the employee master for the period December 2020, PT IIS – Buatan I Estate still have temporary workers (Daily: PHL) who do cores jobs, namely:</p> <p><u>Buatan Estate:</u></p> <p>Harvester : 16 workers FFB Loader : 4 workers Mandor : 0 workers</p> <p>Total : 20 workers</p> <p>In the 2020 period, 14 harvesting workers were appointed from daily workers (PHL) to permanent workers (SKU), based on the Memorandum from Regional Head Plantation II No. 280/HR-RO2/MEMO/SK/09/2020 dated 08 September 2020, for example:</p> <ul style="list-style-type: none"> - Memorandum No. 280/HR-RO2/MEMO/SK/09/2020 dated 08 September 2020 for the promotion of an employee named David M M.R. Cianipar (harvester) at Buatan I Estate is valid from October 1, 2020. - Memorandum No. 096-099/HR-RO2/MEMO/SK/04/2020 dated 27 April 2020 for the promotion of harvesting workers named: Murzal, Edi Sudrajad, Sugiarto and Joko Prayogi at Buatan I Estate starting from May 1, 2020. 	
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained</p>	<p>Buatan I POM and Estate: Freedom of association policy, dated 01 December 2019, written in</p>	Complied

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	<p>to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>Bahasa Indonesia, this policy has been informed to all employees and being placed into public area easily accessed. The freedom to gather and form associations is listed in the Company Policy at point 16: <i>...Perusahaan menghormati hak setiap karyawan untuk membentuk atau menjadi anggota serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif."</i></p> <p>The company's policy is also published to use posters at any strategic places in the plantations (Buatan Estate and Mill). Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Grup on 3- 7 February 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 January 2020 which was attended by 25 stakeholders.</p> <p>A Policy for ethical conduct is including on Company policy has been socialized/delivered to all levels of PT IIS – Buatan Group employees on 21-22 January 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 23-43 January 2020 which was attended by 25 stakeholders.</p> <p>PT Inti Indosawit Subur – Buatan Group has established a Labor Union in accordance with the Decision Letter of PC-F.SPPP SPSI of Pelalawan Regency No. Kep-24/MUSNIK-SP.PP/SPSI/PT.IIS/05/2015, dated 26 April 2015 regarding "<i>Pengesahan komposisi dan Personalia Pengurus Unit Kerja Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia PT Inti Indosawit Subru Masa Bakti 2015-2020'</i>", and has been registered with the Manpower Office of Pelalawan Regency. 255/DTK-PEN/2018/08 dated 31 July 2018 and valid until 31 July 2021 Chaired by Walim Waluyan and Denny Andri Anno as secretarist.</p> <p>Scheme Smallholder:</p> <p>Manager of Kebun Plasma Buatan has established the ICS Policy under "Kebijakan Group Manager" dated 14 February 2020, that was signed</p>	
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		<p>by Manajer of Kebun Plasma Buatan, in point 9 was mentioned “<i>Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur</i>” – to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.</p> <p>This policy has been socialized by the KUD/Cooperative each to all members, partners and surrounding communities, i.e In Sumber Rezeki Cooperative on 16 February 2020 which was attended by 20 participants. At the Jaya Makmur Cooperative on 14 February 2020 which was attended by 21 participants.</p> <p>The policy is also written in their farmer handbook “<i>Buku Panduan Petani</i>”. The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p>	<p>Buatan I POM and Estate:</p> <p>The union labor has 242 members consisting of employees of Buatan I Estate and POM. Based on an interview with the chairman of the Buatan I Estate and Mill (Mr. Walin Waluyan) that in terms of establishing the organizational structure of the management of PT IIS - Made by the Group does not interfere and influence. Trade unions can freely recruit members and as a sign of membership, trade unions also provide membership cards.</p> <p>The Union Labor meeting with management on 2020 period, including:</p> <ol style="list-style-type: none"> 1. The meeting between SPSI and the Management of PT IIS on August 27, 2019, there were several discussions, related: delivery of production targets and the preparation of labor needed and socialization to employees regarding awareness of the use of PPE 	Complied

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		<ol style="list-style-type: none"> 2. Minutes of the meeting for the meeting on October 9, 2020, a meeting to discuss related: <ul style="list-style-type: none"> - Payment of pruning wages - Providing work / harvest tools (fiber, egrek etc.) - Wages and transport premiums are empty 3. Minutes of the meeting for the meeting on 23 September 2020, a meeting to discuss related: delivery of productivities of harvester and mandatory for PPE wearing to all workers. 4. Meeting with the management Ukui 1 Estate on 23 August 2020, discussed associated with the submission of the target production and lack of labor, liabilities use of personal protection for the entire employees. Harvesters. 	
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p>	<p>Buatan I POM and Estate: PT Inti Indosawit Subur – Buatan Group has company policy signed by Managing Director on 01/12/2014. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.</p> <p>The union labor has 242 members consisting of employees of Buatan I Estate and POM. Based on an interview with the chairman of the Buatan I Estate and Mill (Mr. Walin Waluyan) that in terms of establishing the organizational structure of the management of PT IIS - Made by the Group does not interfere and influence. Trade unions can freely recruit members and as a sign of membership, trade unions also provide membership cards.</p>	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p>	<p>Buatan I POM and Estate: PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, that stated there is not allowed all children to work</p>	Complied

		<p>in every activities/processes in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities".</p> <p>Certificate holders - PT IIS – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p> <p>Data seen:</p> <ul style="list-style-type: none"> - Employee register of Buatan I POM, May 2020 period. There were 134 workers in POM, the youngest worker namely Ramadhan Syahalam Damanik date of birth 1 April 1999 and joint on 1 September 2019 (21 years and 5 months). - Employee register of Buatan I Estate, May 2020 period. There were 482 workers in operation, the youngest worker namely Agustinus Sitompul date of birth 28 August 2000 and joint on 1 June 2020 (19 years and 9 months). - FFB Supplier Statement and Guarantee, on behalf of supplier Mr. Ilham dated 1 August 2019. - FFB Supplier Statement and Guarantee, on behalf of supplier Mr. Parlaungan Panjaitan CV Maju Bersama, on 18 February 2019. <p>Scheme Smallholder:</p> <p>Plasma Buatan I have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the Jaya Makmur Cooperative Policy dated 14 February 2020, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity". This policy was disseminated to all members on 14 February 2020.</p>	
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		Based on document review (list of employees) of Cooperative Jaya Makmur and Cooperative Sumber Rezeki, there were found that a minimum age are met (the youngest of harvester born year 1996 – based on ID verification).	
6.4.2	(C) Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.	<p>Buatan I POM and Estate:</p> <p>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/processes in company.</p> <p>Data seen:</p> <ul style="list-style-type: none"> - Employee register of Buatan I POM, updated May 2020. There were 134 workers in POM, the youngest worker namely Ramadhan S.D. date of birth 1st April 1999 and joint for work on 1st September 2019 (20 years and 5 months). - Employee register of Buatan I Estate, updated May 2020. There were 482 workers in Estate, the youngest worker namely Agustinus Sitompul date of birth 28th August 2000 and joint for work on 1st July 2020 (19 years and 9 months). - Based on verification of employees register and payroll period may 2020, it was no found workers hired under 18 years. <p>Scheme Smallholder:</p> <p>Based on verification of employees register (harvester and manuring workers) and document of employments agreement (Surat Perjanjian Bersama) of KUD Jaya Makmur and KUD Sumber Rejeki, there were found that a minimum age are met (the youngest of harvester born year 1984 – based on ID verification), for example: harvester name Kohir working at KUD Sumber Rejeki.</p>	Complied
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	As outlined in indicator 6.4.1, the company has a policy on the Prohibition of Child Labor as outlined in the company's".	Complied

		Based on verification of worker documents for period October 2019 in each Estate and Mill, there are no workers who are less than 18 years of age when hired as workers.	
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>Buatan I POM, Estate and Schem Samllholder:</p> <p>Based on interviews with contractors, workers union officials, Group Manager committees and workers in field, showed that they have understood company policies to prohibit the use of child labor in all types of company operational activities.</p>	Complied
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.	<p>Buatan I POM and Estate:</p> <p>PT Inti Indosawit Subur – Buataan I POM has established a policy to prevent sexual and all other forms of harassment and violence as in "Kebijakan Perusahaan" that was signed by Managing Director dated 1st December 2019, in point 15; "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights". This policy has been socialization/dissemination to all employees in work place on 17-21 February 2020.</p> <p>Data seen:</p> <ul style="list-style-type: none"> Record of refreshment communication the company policy dated 17-21 February 2020 attended by 200 workers. The policy is prominent displayed on notice boards at the Mills and the Estates areas. <p>Scheme smallholder:</p> <p>Manager of Kebun Plasma Buatan has established the Policy under "Kebijakan Group Manager" dated 2nd January 2018, that was signed by Manajer of Plasma Buatan, point 6 stated "Mencegah pelecehan sexual dan berbagai bentuk kekerasan terhadap perempuan".</p>	Complied

		<p>In each cooperative or KUD has also established a Cooperative policy, related to sexual harassment and violence explained in point 11; "Preventing sexual harassment and various forms of violence against women and protecting their reproduction rights, for example: Jaya Makmur, Bahkti Mandiri and Sumber Rejeki Cooperative Policy has been established on 14 February 2020 and was communicated to all members on 14 February 2020.</p>	
<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>Buatan I POM and Estate: PT Inti Indosawit Subur – Buatan I POM has established a policy, related to protect the reproductive rights "Kebijakan Perusahaan" that was signed by Managing Director dated 1st December 2019, in point 15; "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights". This policy has been socialization/dissemination to all employees in work place on 17-21 February 2020.</p> <p>Based on the PKB: Collective Labor Agreement for the period 2018 - 2020, the company has granted rights to female workers related to the protection of their reproductive rights, in the PKB Article IV document; Working hours at point 6: Entrepreneurs are prohibited from associating with pregnant women who according to doctors for the health and safety of their wombs and themselves, they work between 23.00 and 07.00 ". Based on Internal Memorandum No. 325/EST/MEMO/ 01/2020, dated January 6, 2020 from the Buatan Group Manager, related: "Policy regarding doctor's recommendation for female workers who are menstruating experiencing pain not to have to work on the first and second day of menstruation".</p> <p>Programmatically once a month, the company checks the pregnancy of female workers. 6 Female workers who work as herbicide and pesticide (chemical) sprayers, finally checking the skills of female workers on May 2, 2020</p>	<p>Complied</p>

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		<p>Scheme smallholder:</p> <p>Manager of Kebun Plasma Buatan has established the Policy under "Kebijakan Group Manager" dated 2nd January 2018, that was signed by Manajer of Plasma Buatan, point 6 stated "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan".</p> <p>In each cooperative or KUD has also established a Cooperative policy, related to sexual harassment and violence explained in point 11 and 12; 11) "Preventing sexual harassment and various forms of violence against women and protecting their reproduction rights and 12) Give leave rights for female workers who are pregnant, for example: Jaya Makmur, Bahkti Mandiri and Sumber Rejeki Cooperative Policy has been established on 14 February 2020 and was communicated to all members on 14 February 2020.</p>	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.	<p>Buatan I POM and Estate:</p> <p>For breastfeeding mothers and had children under 5 years, the company has provided child care (TPA) which is located in each division/Afdeling. In TPA or childcare space as well as the company provides a special space and time for 1 hour for breastfeeding mothers in need time to nursing his baby.</p> <p>During onsite audit, interview with child care workers and new mother confirmed that company has provided the special nursery room and give the time 1 hour during working hour for breastfeeding her child. In addition, the management has consult with new mother to assess their needs including the nursery facility and breastfeeding time.</p>	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.	<p>Buatan I POM and Estate:</p> <p>Company has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01) while complaint from internal regulated under "<i>Mekanisme</i></p>	Complied

		<p><i>Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i> – Employee’ complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees. Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.</p> <p>Record of complaint/specific grievance has demonstrated under “Buku Keluhan Karyawan”. Up to December 2020 at Buatan 1 Estate and Mill there were 16 complaints/grievances recorded and each recommendation responses has followed up as well. The mostly of grievance or complaint from employees is related to the damage of housing and public facilities, for example:</p> <ul style="list-style-type: none"> - Complaint on 21 May 2020 from employee namely Budi Sukamto, related Stairs and the bathroom door suffered damage, this complaint has followed up on 21 May 2020. - Complaint on 27 August 2020 from employee namely Boi Nduru, related leaked of septic tank, this complaint has followed up on 27 August 2020. - Complaint on 30 September 2020 from employee namely Ekianus Zega, related leaked of zinc roof house, this complaint has followed up on 30 September 2020. <p>Scheme Smallholders:</p> <p>The scheme smallholders have mechanism of consultation and communication in “Mekanisme komunikasi, konsultasi dan keluhan Kebun Plasma Ukui Group”, dated 16th January 2018.</p> <p>Based on log book of record in the form of “Penerimaan Keluhan dan Tanggapan”. On 2019 period, there was no grievance reported, all of complaints has been followed and recorded.</p>	
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Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages 	<p>Buatan I POM and Estate:</p> <p>Based on document list of employees verification, there was no indication of forced labour, contract substitution and/or human trafficking. All employees have had work agreement, regulating the rights and obligation of company and employee. The work agreement including working hour and salary payment.</p> <p>Based on the overtime warrant, it has been verified that there are no indications of an overtime order being forced, overtime is carried out on the approved order. There is no indication that there are workers who work due to debt bondage, nor are there any fees at the time of employee recruitment. All workers have been determined based on the agreed work contract, if there is a worker who will decide to stop working before the contract period ends, the company will conduct counseling / interview with the employee concerned and the decision taken is based on an agreement between the two parties.</p> <p>Based on document verification and salary payment, shows employee have paid in accordance to minimum wage regulation, as well as verification to the master list of employees May 2020 period, that there is no use of migrant/foreign/honorary worker.</p> <p>All employee including temporary workers have work agreement; regulating the scope of work, work agreement timeframe, working hour, salary payment, overtime and Jamsostek. Based on verification of master list of employees May 2020 period, there were no indication of contract substitution occurred. All employees have work agreement, explaining the rights and obligation including scope of work.</p> <p>Scheme Smallholders:</p> <p>Similar to estate and mill, there is no forced and trafficked labour has noted during assessment.</p>	Complied

		<p>KUD has a policy related to use of migrant worker inside "Kebijakan Koperasi". Based on document verification, there were no migrant worker used in cooperative.</p> <p>All worker in cooperative have work agreement. All of them already appointed as permanent worker.</p>	
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur – Buatan Group uses temporary workers as BHL in Buatan I Estate, Plasma and Buatan I Mill operations. Based on employee list period May 2020, there are 268 workers in Buatan I Estate, 3 workers in Plasma Buatan I and 19 workers in Buatan I Mill.</p> <p>The company has a procedure regarding SOP New Employee Reception No. AA-HR-305.2-R0 dated 1 February 2009, this procedure is a general acceptance of employees (for all employees), but there are no specific procedures and policies regarding BHL or PKWT workers according to the RSPO P&C requirements.</p>	Complied
<p>Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Inti Indosawit Subur – Buatan POM has appointed a person who responsible on OHS implementation and monitoring. The safety commite has defined in all estate and POM under P2K3 (Panitia Pembina Keselamatan dan Kesehatan Kerja).</p> <p>Sample seen:</p> <ul style="list-style-type: none"> – Safety committe has defined under "Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Propinsi Riau nomor Kep.13/Disnakertrans-PK/SK-P2K3/II/2020 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur – Kebun Buatan, updated on 6th February 2020 – The company has also assigned the person who responsible on OHS expert (AK3- Umum), namely Mr Syahdan Ryaldi with license 	Complied

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		<p>number: No.Reg 73238PK3/AJ/14/2019/P0 dated 9th September 2019 valid until 3 years.</p> <ul style="list-style-type: none"> - Record of monthly meeting (P2K3), sample seen: MoM on 15 February 2020, agenda meeting: review on previous OHS meeting, review of inspection of PPE usage, review on accidents report. - Three months report on OHS performance for period April – June 2020 was sent to Manpower Agency in Riau <p><u>Scheme smallholders:</u></p> <p>Each KUD has established a team who has been responsible on implementation and implementation the OHS program, e.g: in KUD SUmber Rejeki dan KUD Jaya Makmur has shown the structure of emergency response</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT Inti Indosawit Subur – Buatan I POM has defined the procedure for emergency response under Standar Operatonal Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> - Nomor AA-KL-11-EFP tentang Penanganan Tumpahan di Laboratorium - Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan - Nomor AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3 - Nomor AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya - Nomor AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor - Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap <p>PT Inti Indosawit Subur – Buatan I POM has also pepared the procedure on work accident under "Standard Operasioanl Prosedur –</p>	Complied

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		<p>Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0", revision 0 dated 1st April 2018.</p> <p>Data verified:</p> <ul style="list-style-type: none"> - The company has also appointed the person who has attended first aid training, namely Ms Supriani (license number on first aider 566/DTKT-WAS/LC/P3K/100 - Emergency response team has defined as in "Struktur Organisasi Tanggap Darurat" year 2020. - List of first aid kit (include portable first aid) as in "List Kebutuhan Obat-Obatan P3K updated in May 2020 	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Inti Indosawit Subur – Buatan I POM has demonstrated the record of realization the OHS program 2020 including use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting, such as:</p> <ul style="list-style-type: none"> - Report of MCU for all workers in Buatan I mill, was conducted by "Klinik Asian Agri Sehat Buatan", dated 10 December 2020 was attended by 52 workers. The MCU was covered urine test, HSaAg and fisical test. - Monitoring of emergency response and peparedeness facilities, i.e: fire hydrant (9 units) and fire extinguisher (23 units), updated in March 2021, location in Buatan I POM. - Socialization the company's policies, conducted in 3rd January 2020 – location in PBS was attended by 27 workers - Report of OHS inspection report, location in Buatan I POM dated 23rd January 2021 – reported OK for PPE usage, and OHS facilities (fire hydrant and . 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Record of handover of PPE, location in KUD Jaya Makmur and KUD Sumber Rejeki dated 9th October 2019; PPE: herlme, safety glasses. - "Checklist on monitoring of PPE use for harvester in KUD Mulus Rahayu dated 12 and 24 December 2020. Reported Ok for safety helmet, AP boot, safety glasses, chisel cover. <p>Based on field visit in Kavling 1449, 1451 and 1457 in KUD Jaya Kamur; there was found the harvester has used in PPE as required in HIRADC.</p>	
6.7.4	All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.	<p>PT Inti Indosawit Subur – Buatan I POM has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurane for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment and working tools.</p> <p>PT Inti Indosawit Subur – Buatan I POM has provided regular medical check-up for workers in high risk such as sprayer team, fertilizer applicator, workshop worker and mill operators.</p> <p><u>Scheme smallholders:</u></p> <p>The government covers medical insurance for smallholders and it is optional. Based on interview with smallholders at KUD Sumber Rejeki & Jaya Makmur, most of farmers/smallholders has had insurance (BPJS Kesehatan Mandiri).</p> <p>Data verified:</p> <p>Evidence of payment period for BPJS TK and BPJS KS (medical insurance) month January 2021- payment code #190600027480 and #190602336151. Status PAID</p>	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	PT Inti Indosawit Subur – Buatan I POM has been kept the recprd of occupational injuries using LTA metrics under "Data Laporan Kecelakaan Kerja" year 2020.	Complied

		<p>Data seen:</p> <ul style="list-style-type: none"> - The occupational injuries reported 7 cases . Lost time injuries is 50 man-days - All the accident has carried out the inverstigation. The followed up on recommendation on result of investigation available as evidents. <p><u>Scheme Smallholders:</u></p> <p>The record of injuries has shown under document of "Monitoring Kecelakaan Kerja 2020", since 2018 to 2020 there were no injuries cases (Nill).</p>	
<p>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</p>			
<p>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p>	<p>Buatan Estates:</p> <p>According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control), certificate holder has plan to be implemented integrated pest management.</p> <p>Based on document verification obtained information that management has had a schedule to regularly monitored pest attack (census) as follows:</p> <ul style="list-style-type: none"> • Census of caterpillar/bag worm by monthly basis. • Census of Ganoderma annually. • Census rat infestation by recap the record of sortation in loading ramp. • Census of Barn Owl Box occupation in three monthly bases. <p>The last census in Buatan Estate has been conducted in second week of November 2019. Result of census shows that pest attack still under</p>	<p>Complied</p>

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		<p>control (below the economic threshold) which is 0,3 – 1,3% (limit 5%).</p> <p>According to estate manager information, there is no outbreak found at this time. Condition in the ground are under control and well monitored. Certificate holder has used beneficial plant such as <i>Turnera subulata</i> and <i>Antigonon leptosus</i> (planted along side of main/collection road) in order the gathered natural predator of caterpillar/bagworm.</p> <p>Scheme Smallholder:</p> <p>According to document verification, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of KUD.</p> <p>Further information will be verified during onsite audit.</p> <p>During the field visit in own estate (Buatan Estate block B20g Afdeling 2) and smallholder’s area (KUD Jaya Makmur ad Sumber Rejeki), visually there was no issues related to the outbreak or infestation. However, there were a usage of natural predator (<i>Tyto alba</i>) to reduce a rat infestation.</p>	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	The company only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website www.cabi.org on in global invasive species database http://www.iucngisd.org/gisd/search.php .	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on document verification, interview and field observation obtained information that there is no record use of fire for pest control.	Complied

Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.

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<p>7.2.1</p>	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>PT Inti Indosawit Subur – Buatan Group has had the procedure related to pesticide usage for chemical weeding and pest control (if needed). The recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>Onsite Audit:</p> <p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>During the audit, found some pesticide list that usually used with active ingredients such as isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, paraquat diklorida, diuron, lamda sihalotrin and dimetil amina. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>According to the national regulation, all pesticide used by the management unit has registered in agricultural ministry of Indonesia. It can be check in http://pestisida.id/simpes_app/index.php. The type of pesticide use by management unit during January 2020 – February 2021 and its weeds target are as follow:</p>	<p>Complied</p>
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Agro-chemical	Active ingredients	Register No.	Target
Kenlon 480 EC	Trikolpir Bitoksi Etil Ester 480 g/l	RI.01030120062433 Valid until 31 Dec 2021	Wood
Elang 480 SL	Isopropil Amina Glifosat 480 g/l	RI.01030119941170 Valid until 21 Dec 2021	Narrow leaf weed, <i>Asystasia Imperata cylindrical</i>
Kenrane 288 EC	Floroksipir 1-MHE: 288 g/l	RI.01010120103759 Valid until 20 Dec 2020	<i>Legume, Asystasia</i>
Basta 150 SL	Amonium Glufosinat 150 g/l	RI.01030119921113 Valid until 22 Jan 2024	Wide leaf (<i>Ageratum conyzoides</i>); narrow leaf (<i>Axonophus compressus, Imperata cylindrical, Ischaemum timorense, Ottochloa nodosa, Setaria palmifolia</i>).
Karmex 80 WP	Diuron 80%	RI.01030120113958	broadleaf weeds (<i>Borreria latifolia, Asystasia intrusa, Clidemia hirta, Mikania micrantha</i>) and narrow leaf weeds (<i>Imperata cylindrical, Cyperus rotundus, Cyclosorus aridus</i>)

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		<table border="1"> <tr> <td>Metaprima</td> <td>Metil melsulfuron</td> <td>RI.01030120031897 Valid until 03 September 2023</td> <td>Broadleaf weeds, Ageratum conyzoides, Calopogonium mucunoides, Clidemia hirta, Synedrella nodiflora.</td> </tr> <tr> <td>Rolidor 25EC</td> <td>Lamda sihalotrin</td> <td>RI.01010120031921 Valid until 03 September 2023</td> <td>Spodoptera litura</td> </tr> <tr> <td>Nordox 86WG</td> <td>Copper oxide</td> <td>RI. 01020119951188 Valid until 11 May 2021</td> <td>Leaf disease</td> </tr> <tr> <td>Gulmaron 80WP</td> <td>Diuron 80%</td> <td>RI. 01030119981413 Valid until 2 May 2022</td> <td>Broadleaf weeds, Synedrella nodiflora, Eleusine indica</td> </tr> </table>	Metaprima	Metil melsulfuron	RI.01030120031897 Valid until 03 September 2023	Broadleaf weeds, Ageratum conyzoides, Calopogonium mucunoides, Clidemia hirta, Synedrella nodiflora.	Rolidor 25EC	Lamda sihalotrin	RI.01010120031921 Valid until 03 September 2023	Spodoptera litura	Nordox 86WG	Copper oxide	RI. 01020119951188 Valid until 11 May 2021	Leaf disease	Gulmaron 80WP	Diuron 80%	RI. 01030119981413 Valid until 2 May 2022	Broadleaf weeds, Synedrella nodiflora, Eleusine indica	
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7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Buatan Estate has calculated the LD50 of each pesticide in a monthly bases.	Complied																
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Until this recertification audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide). Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.	Complied																
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	There was some pesticide usage especially in nursery and immature area to prevent pest infestation. For example, there was a record of pesticide (active ingredients Lamda sihalotrin) to prevent <i>Spodoptera litura</i> infestation. This prophylactic usage has followed the national	Complied																

		<p>guidelines such as dosage, interval and infestation rate. Also, in accordance to Asian Agri's Research and Development guidelines.</p>	
<p>7.2.5</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>According to bin card in chemical store obtained information of pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, paraquat diklorida, diuron, and lamda sihalotrin</i>. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>To reduce the human and environmental risk, there is some continuous action that has been implemented as follows:</p> <ul style="list-style-type: none"> • Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm. • Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herby system knapsack as example. • Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's. • Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the 	<p>Complied</p>

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		<p>pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control.</p> <ul style="list-style-type: none"> Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home. 	
	7.2.5b Why there is no other alternative which can be used.	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Buatan Estate has calculated the LD50 of each pesticide in a monthly basis.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	<p>Until this recertification audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide).</p> <p>Based on interview with field assistant and smallholder representatives known that no outbreak that causes pesticide usage.</p>	
	7.2.5d Process to limit the negative impacts of the application.	Based on document verification, interview and field observation obtained information that there is no record of negative impact related to the pesticide application.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	<p>Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients). There is only <i>paraquat diklorida</i> that listed as WHO Class II (Moderately Hazardous). As described in this indicator, the company no longer using <i>paraquat diklorida</i> since November 2019.</p> <p>There is no use of other pesticide class 1A and 1B until the audit.</p>	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	PT Inti Indosawit Subur – Buatan I POM has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted	Complied

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		<p>by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on February 2020. Some topic that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures.</p> <p>Workers that perform herbicide spraying in Buatan Estate also perform spraying activity in smallholder plantation. Spraying team has been trained with pesticide handling training, agrochemical application training and limited pesticide training. Spraying team only handles herbicide to control the weed. Sprayers understood the type of chemical for each weed type, the hazard, the application and appropriate PPE use.</p> <p>Applicator team, e.g: L Mr Mawardian (certificate of pesticides training No.539/Set-KP3/I/2013), Mrs Yanna (certificate of training handling of pesticide No.218/Set- KP3/I/2014 and Mrs (certificate of pesticides training No.216/Set- KP3/I/2014)</p> <p>During onsite audit year 2021, auditor team has also interviewed sample of smallholder representatives in KUD Sumber Rejeki and KUD Jaya Makmur and obtain information that the company has provide training session for them on how to be handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.</p>	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices.	PT Inti Indosawit Subur has a pesticide storage. Location of the pesticides storage in Buatan Estate.	Complied

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		<p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked in areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spillage was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area. Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> <p>Based on a field visit to the Pesticides Storage dated 2nd March 2021, there was found that:</p> <ul style="list-style-type: none"> - Permanent Buildings, - A good ventilation, - Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", - Eye wash shower, first aid box, PPE and Fire extinguisher are provided. - PPE room - Operation control: MSDS are available for all types of existing pesticides and the pesticide management and safety instructions are available - A package management/ used pesticide package is available 	
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		<ul style="list-style-type: none"> - Water wash of pesticides containers collected in "spillage trap" - The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution. <p>All waste products has been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste.</p>	
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>All chemicals and empty containers collected and stored at permitted hazardous waste storage (Tempat Penyimpanan Sementara Limbah B3) location in Buatan I POM.</p> <p><u>Scheme smallholders:</u></p> <p>Group manager Smallholder Buatan has a policy and mechanism to manage the waste from ex fertilizer sack according to procedure of "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun No. 035/DOK/SOP/PT.IIS KLB-AA/2016" dated 2 December 2016. The ex fertilizer sack must be handled by triple rinse and use as loosefruit sack, the innerbag of fertilizer was delivered to collector.</p> <p>During field visit and interview with sample smallholder in KUD Sumber Rejeki and KUD Jaya Makmur dated 4 March 2021, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.</p>	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Based on interview with sustainability staff and field visit confirmed that there is no aerial spraying pesticide performed by PT IIS – Buatan Estate.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Buatan Estate & Scheme Smallholder:	Complied

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		<p>Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide and fertilizer.</p> <p>The latest medical check-up performed on 12th December 2020 at company medical healthcare “Klinik Asian Ari Sehat Buatan” and attended by 110 workers, consisted of fertilizer applicators, spraying applicator and PIC in pesticides storage.</p> <p>The result of MCU has communicated to all workers on 2 and 9 January 2021</p> <p>Medical examination for smallholder’s pesticide operator are include with Estate, because those chemical/spraying operators are work at Estate and Smallholders area. Sample: KUD Sumber Rejeki and KUD Jaya Makmur.</p>	
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p>	<p>PT Inti Indosawit Subur – Buatan Group prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Buatan I POM has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted on 3 October 2020, 7 November 2020 and 5 December 2020. All the female sprayer in well condition and not being pregnant nor breast feeding. E.g: Employee code: 0907 (Mrs El*j*), 07137 (Mrs D*r**n S**g**n)</p>	Complied
<p>Note For 7.2.11</p> <p>Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p>			
<p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			

7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.	<p>PT Inti Indosawit Subur – Buatan I POM and Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>PT Inti Indosawit Subur – Buatan I POM has prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter</p> <p>PT Inti Indosawit Subur – Buatan I POM has been stored the hazardous waste in temporary storage with permit. The temporary hazardous waste storage has a valid permit based on “Surat Keputusan Badan Penanaman Modal dan Pelayanan Perijinan Terpadu nomor: KPTS.503/BPMP2T-PLY/14/2016, dated 18 March 2016, the license valid until 5 year 2021.The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Indostar Cargo.</p> <p>A documented waste management plan to avoid or reduce pollution and its implementation shall available under document of Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2020. The document covered all operation in mill, estate and its smallholders.</p>	Complied
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>PT Inti Indosawit Subur has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p> <p>The company store hazardous waste in temporary storage with permit, The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Indostar Cargo.</p>	Complied

		Based on interview with workers who are handling of pesticides that they understood of disposed empty containers pesticides, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.	
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>All waste products has been identified and documented under the "Evaluasi Aspek- Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste. The document of "Jadwal Pengangkutan Sampah 2019 untuk Karyawan Buatan Estate, update 15 Jan 2019". Regulation of domestic waste management refer to "UU No. 18 Tahun 2008 tentang Pengelolaan Sampah".</p> <p>ICS Group Plasma Buatan has defined the procedure "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun" No. 035/DOK/SOP/PT.IIS KLB-AA/2016 dated 2 December 2016. All ex fertilizer sack was prohibit to dispose in plantation and housing area. All the ex fertilizer sack usage must be identified and reported to Group Manager ICS.</p>	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>Buatan Estate & Scheme Smallholder:</p> <p>Both own estate and smallholder has had the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring is based on fertilizer recommendation that set by Asian Agri's Research and Development Department. Fertilizer dosage has set according to the soil needed refer to SSU/LSU.</p> <p>Based on interview with smallholder representatives obtain information that they only using fertilizer according to the recommendation from Asian Agri's Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.</p>	Complied

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		<p>During the onsite audit known that the management unit has applied fertilizer according to the fertilizer’s recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block B19a Afdeling 2 using TSP with dosage 0.6 kg/palm (this is in accordance with fertilizer’s recommendation 2021).</p> <p>In addition, management unit also applied EFB application especially in new planting and immature areas to maintain soil fertility, maintain soil moisture and reducing weed. Based on field visit in Block B20j Afdeling 2, auditor has verified the EFB application in immature area with dosage 30 ton/Ha/year.</p> <p>Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2023 – 2023.</p>	
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	<p>According to the Asian Agri’s agricultural policy, soil sampling conducted every 5 years while leaf sampling conducted annually. Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <ul style="list-style-type: none"> • The last soil sampling conducted on August 2018. Parameter that tested is N, C, K, Ca, Mg and pH. • The last leaf sampling conducted on April 2020. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). <p>Those reports are converted to be fertilizer recommendation by Asian Agri’s Research and Development Department.</p>	Complied
7.4.3	A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	<p>Buatan Estate & Scheme Smallholder:</p> <p>According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m3/Ha in Buatan Estate.</p>	Complied

		<p>According to the interview with smallholder representatives, currently there is no longer EFB application since their area has planned to be replanting.</p> <p>During the audit known that the management unit has applied fertilizer according to the fertilizer’s recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block B19a Afdeling 2 using TSP with dosage 0.6 kg/palm (this is in accordance with fertilizer’s recommendation 2021).</p> <p>In addition, management unit also applied EFB application especially in new planting and immature areas to maintain soil fertility, maintain soil moisture and reducing weed. Based on field visit in Block B20j Afdeling 2, auditor has verified the EFB application in immature area with dosage 30 ton/Ha/year.</p> <p>Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2023 – 2023.</p>	
7.4.4	Records of fertilizer inputs are maintained.	Record of fertilizer application in estate are in places. For example, there is a record of TSP application in B19a with dosage 0.6 kg/palm in fertilizer supervisor daily report.	Complied
Criteria 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>Own Estate:</p> <p>Soil Analysis in PT Inti Indosawit Subur – Buatan Estate carried out in October – December 2008. Reported under “Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan”. Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium.</p> <p>Soil map scale 1:20,000 available, from semi- detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Division IV,</p>	Complied

		<p>V and VI Buatan Estate composed of Typic dystrodepts (dominant), Typic kandiuults, Typic Endoaquults, Typic endoaquepts.</p> <p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2008 by R&D Asian Agri.</p> <p>Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage.</p> <p>Scheme Smallholder:</p> <p>The soil map for all individual member was available at Plasma Buatan office and KUD office with scale 1:50,000. There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Endoaquults 4. Typic Kandiuults <p>Soil map and soil survey result recorded in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan".</p>	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on field visit in slope area especially in replanting areas known that the management unit has provide terrace contour. For example, in replanting area, Block A21c Afdeling 2. There is no fire usage during that process. The management unit also provide legume cover crop to minimize the soil erosion.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	There is no new palm oil planting in Buatan Estate.	Not Applicable

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Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	There is no marginal soil within the certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D on December 2008. It was also confirmed during onsite audit to Buatan Estate and Scheme Smallholder.	Complied
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	There is no marginal soil within the certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D on December 2008. It was also confirmed during onsite audit to Buatan Estate and Scheme Smallholder.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	There is no marginal soil within the certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D on December 2008. It was also confirmed during onsite audit to Buatan Estate and Scheme Smallholder.	Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991.	Not Applicable
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991.	Not Applicable

PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	<p>Own Estate: Based on Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Buatan Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Scheme Smallholder: No peat soil in Plasma Buatan I, verified the soil type maps was found that there is no peat soil identified in the Plasma Buatan area. Hence, there is no need to conduct peat subsidence monitoring.</p>	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	<p>Own Estate: Based on Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Buatan Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Scheme Smallholder: No peat soil in Plasma Buatan I, verified the soil type maps was found that there is no peat soil identified in the Plasma Buatan area.</p>	Not Applicable



		Hence, there is no need to set water and land cover management program.	
7.7.5	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p>	<p>Own Estate: PT Inti Indosawit Subur – Buatn Estate conducted coordination with R & D department to performed re-analysis of soil in Buatn Estate area to determine whether peat soil is still existed. Soil Analysis carried out by R & D on December 2008 in Buatn Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatn". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Buatn Estate according to the latest soil analysis by R & D Asian Agri. Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Buatn Estate composed of:</p> <ul style="list-style-type: none"> • Typic Distrudepts 4,040 Ha • Typic Endoaquents 140 Ha • Typic Endoaquepts 515 Ha • Typic Endoaquults 290 Ha • Typic Kandiudults 621 Ha • Typic Udipsaments 25 Ha <p>Total 5,361 Ha</p> <p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2017 by R&D Asian Agri. Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low</p>	Not Applicable

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		<p>natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage. Therefore, drainability assessment of peat soils were not applicable for Buatan Estate.</p> <p>Scheme Smallholder:</p> <p>No peat soil in Plasma Buatan I, verified the soil type maps was found that there is no peat soil identified in the Plasma Buatan area.</p> <p>There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Endoaquults 4. Typic Kandiodults 	
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p>	<p>There are no peat areas within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma in accordance with Soil Analysis carried out by R & D on December 2008. It was also confirmed during field visit and onsite audit to Buatan Estate and Scheme Smallholder.</p>	Not Applicable
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of</p>	<p>There are no peat areas within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma in accordance with Soil Analysis</p>	Not Applicable

	<p>certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p>	<p>carried out by R & D on December 2008. It was also confirmed during field visit and onsite audit to Buatan Estate and Scheme Smallholder.</p>	
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Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.

No	Category of River	Cross Section	Outside the Settlement		Inside the Settlement		Articles
			Criteria	Minimum Riparian Zone	Criteria	Minimum Riparian Zone	
1	Levee		-	5 m	-	3 m	Article 6
2	Rivers with no dike (from river bank)		Big River River Basin > 500 km2	100 m	Depth : > 20 m	30 m	Articles 7 & 8
			Small River River Basin < 500 km2	50 m	Depth : 3 m to 20 m	15 m	Articles 7 & 8
3	Lake / Reservoir		-	50 m	-	50 m	Article 10
4	Water Springs		-	200 m	-	200 m	Article 10
5	Rivers affected by tides (from river bank)		-	100 m	-	100 m	Article 10

<p>7.8.1</p>	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters: 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>PT Inti Indosawit Subur - Buatan has prepared the plan of water management plan as in "Program Manajemen Lingkungan 2020" consist of management water supply for domestic, water consumption and measurement of water quality. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation. The company has conducted measurement of water quality regularly (each semester) and consistent, the result of analysis semester II 2019 shown that water quality is complies with national regulation. All of KUD has program on water management as in "Rencana dan Realisasi Penyusunan Pelapah Letter "U", frond stacking."Rencana dan</p>	<p>Complied</p>
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		<p>Realisasi Perawatan Teresan sebagai Sarana Konservasi Tanah dan Air serta Upaya Pencegahan Erosi”</p> <p>PT Inti Indosawit Subur – Buatan I POM has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> - Riparian restoration with forest vegetation plant/tree. - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Laniago) in block BA90 - Conserve natural vegetation in riparian zone - Restricted to conduct replanting palm oil in riparian area. <p>PT Inti Indosawit Subur – Buatan I POM has also prepared the procedure on protection of water courses under “SOP Pengendalian Riaprian” number AA-APM-OP-1100.21-R2, dated 25th February 2016.</p> <p>Buatan I POM has permit for surface water usage from “Kementerian Pekerjaan Umum dan Perumahan Rakyat” as per “Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat nomor 14/KPTS/M/2018 tentang Pemberian izin Pengusahaan Sumber Daya Air kepada PT Inti Indosawit Subur untuk Usaha Industri di Sungai Laniago, Kabupaten Pelalawan dan Kabupaten Siak”, dated 5th January 2018.</p> <p>Buatan I POM also paid the water retribution each month to “UPT Pengelolaan Pendapatan, Badan Pendapatan daerah Pemerintah Provinsi Riau”. Sample: SPPD (Surat Setoran Pajak Daerah) untuk Pajak Pengambilan dan Pemanfaatan Air Permukaan untuk period January – March 2020, dated 28th April 2020, IDR XX.578.100</p> <p>Scheme smallholders:</p> <p>All of KUD has program on water management as in “Rencana dan Realisasi Penyusunan Pelapah Letter “U”, frond stacking.”Rencana dan Realisasi Perawatan Teresan sebagai Sarana Konservasi Tanah dan Air</p>	
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		serta Upaya Pencegahan Erosi”. During field visit can be demonstrated that smallholder member has implementing frond stacking accordingly to prevent the soil erosion. Water management has also implemented by prohibiting spraying activity near to waterways with distance 3 m from left and side of waterways.	
	7.8.1b Workers have adequate access to clean water.	PT Inti Indosawit Subur - Buatan has prepared the plan of water management plan as in “Program Manajemen Lingkungan 2020” consist of management water supply for domestic, water consumption and measurement of water quality. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation The result of moniting or testing the clean water / water consumption conducted by “Unit Pelaksana Teknisi Laboratorium Bahan Konstruksi”, Pekanbaru. Certificate of Analysis for Domestic Water (by cooking treatment), location in Buatan I POM – Report of Analysis No: MT.1/01.06.45.39, dated 29 May 2020, the reference of analysis report is based on PERMENKES NO 492/MENKES/PER/IV/2010	
7.8.2	(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).	PT Inti Indosawit Subur – Buatan I POM has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian. <ul style="list-style-type: none"> – Riparian restoration with forest vegetation plant/tree. – Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Laniago) in block BA90 – Conserve natural vegetation in riparian zone – Restricted to conduct replanting palm oil in riparian area During field visit to Laniago riparian on block BA90 can be shown that riparian area are well maintained, no chemical application near to	Complied

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		<p>riparian, no disturbance on riparian, natural vegetation are protected and the signboard information and awareness are available.</p>													
<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>Buatan I POM, there was 11 ponds in effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic pond, Secondary Anaerobic pond, Acidification pond, and Buffering pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated February 1, 2013, chapter AA-MPM-OP-1400.13-R1.</p> <p>Buatan I POM is undergoing Biogas power plant construction since April 2015 to generate electrical power by using waste water treatment. The biogas system has Anaerobic MBR system thorough digester Thermophilic fermentation, and anaerobic membrane tank.</p> <p>According to effluent monitoring data, all produced mill effluent used for land application. Mill holds permit to discharge waste water into land application from local authority through Decree number KTPS.660/BLH/780/2014, issued on 10th September 2014 valid for 5 years. Total area of land application covers 679 hectares at Block B and C.</p> <p>As required by LA permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (UPT Pengujian Material, Dinas Bina Marga Provinsi Riau). According to recent testing result, BOD level of applied effluent has met the applicable threshold of KepmenLH No.28/2003 regarding BOD limits of effluent discharge for land application. The level is maintained consistently less than 5,000 mg/L and debit <600 m3 per day.</p> <p>Sample seen – BOD monitoring year 2020:</p> <table border="1" data-bbox="1131 1225 1957 1377"> <thead> <tr> <th>Month</th> <th>BOD (mg/l) – standard of quality 5,000</th> <th>pH – standard of quality 6-9</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>3,800</td> <td>7.42</td> </tr> <tr> <td>February</td> <td>2,100</td> <td>7.9</td> </tr> <tr> <td>March</td> <td>3,200</td> <td>8.18</td> </tr> </tbody> </table>	Month	BOD (mg/l) – standard of quality 5,000	pH – standard of quality 6-9	January	3,800	7.42	February	2,100	7.9	March	3,200	8.18	<p>Complied</p>
Month	BOD (mg/l) – standard of quality 5,000	pH – standard of quality 6-9													
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March	3,200	8.18													

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		<table border="1"> <tr><td>April</td><td>2,114</td><td>7.1</td></tr> <tr><td>May</td><td>3,900</td><td>7.7</td></tr> <tr><td>June</td><td>3,230</td><td>8.14</td></tr> <tr><td>July</td><td>3,450</td><td>7.6</td></tr> <tr><td>August</td><td>3,670</td><td>8.1</td></tr> <tr><td>September</td><td>3,126</td><td>7.6</td></tr> <tr><td>October</td><td>3,100</td><td>7.7</td></tr> <tr><td>November</td><td>2,400</td><td>7.6</td></tr> <tr><td>December</td><td>3,514</td><td>7.3</td></tr> </table> <p>Based on result of monitoring January – December 2020 shown comply with legal requirement “PermenLHK No P.68/Setjen/Kum1/8/2016”.</p>	April	2,114	7.1	May	3,900	7.7	June	3,230	8.14	July	3,450	7.6	August	3,670	8.1	September	3,126	7.6	October	3,100	7.7	November	2,400	7.6	December	3,514	7.3	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Buatan I POM has recorded the mill water use per tonne FFB, includes monitoring of water usage for mill processing and domestic usage. Result of water usage monitoring is recorded under “Mill Operation Summary” year 2020, updated in December 2020.</p> <p>Budget in 2020 is 0.88 M3/Ton FFB, record in January – December 2020 has shown:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Water use per ton FFB</th> </tr> </thead> <tbody> <tr><td>January</td><td>0.92</td></tr> <tr><td>February</td><td>0.83</td></tr> <tr><td>March</td><td>0.84</td></tr> <tr><td>April</td><td>0.78</td></tr> <tr><td>May</td><td>0.86</td></tr> <tr><td>June</td><td>0.91</td></tr> <tr><td>July</td><td>0.88</td></tr> <tr><td>August</td><td>0.87</td></tr> <tr><td>September</td><td>0.91</td></tr> <tr><td>October</td><td>0.90</td></tr> <tr><td>November</td><td>0.86</td></tr> </tbody> </table>	Month	Water use per ton FFB	January	0.92	February	0.83	March	0.84	April	0.78	May	0.86	June	0.91	July	0.88	August	0.87	September	0.91	October	0.90	November	0.86	Complied			
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		<table border="1"> <tr> <td>December</td> <td>0.93</td> </tr> <tr> <td>YTD</td> <td>(budget YTD 0.88)</td> </tr> </table>	December	0.93	YTD	(budget YTD 0.88)							
December	0.93												
YTD	(budget YTD 0.88)												
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised													
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented	<p>PT Inti Indosawit Subur – Buatan I POM has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy under “Rencana Manajemen Lingkungan” year 2020. In point 2 stated to improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels</p> <p>Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Data verified:</p> <p>Trend of fossil fuels used year 2019, in Buatan Estate:</p> <table border="1"> <thead> <tr> <th>Program</th> <th>Unit</th> <th>2019 (km/liter)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Preventive maintenance (services of starter of dynamo)</td> <td>Dum truck 08</td> <td>5.6 km/liter</td> </tr> <tr> <td>Dum truck 12</td> <td>3.2 km/iter</td> </tr> <tr> <td>Dum truck 14</td> <td>3.1 km/liter</td> </tr> </tbody> </table>	Program	Unit	2019 (km/liter)	Preventive maintenance (services of starter of dynamo)	Dum truck 08	5.6 km/liter	Dum truck 12	3.2 km/iter	Dum truck 14	3.1 km/liter	Complied
Program	Unit	2019 (km/liter)											
Preventive maintenance (services of starter of dynamo)	Dum truck 08	5.6 km/liter											
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		<table border="1"> <tr> <td></td> <td>Dum truck 20</td> <td>4.3 km/liter</td> </tr> <tr> <td></td> <td>Dum truck 37</td> <td>3.6 km/liter</td> </tr> <tr> <td>FIP Calibration</td> <td>Dum truck 12</td> <td>3.1 km/liter</td> </tr> <tr> <td>Enginee OH</td> <td>Dum truck 12</td> <td>3 km/liter</td> </tr> </table> <p>Scheme Smallholders: Each KUD has prepared a plan for improving efficiency of the use of fossil fuels and optimize of renewable energy under "Pedoman Pemanfaatan Sumber Energy", last review on 15th January 2020. The source of energy was identified e.g: water, gasoline, fuels, kerosen and electrical.</p>		Dum truck 20	4.3 km/liter		Dum truck 37	3.6 km/liter	FIP Calibration	Dum truck 12	3.1 km/liter	Enginee OH	Dum truck 12	3 km/liter	
	Dum truck 20	4.3 km/liter													
	Dum truck 37	3.6 km/liter													
FIP Calibration	Dum truck 12	3.1 km/liter													
Enginee OH	Dum truck 12	3 km/liter													
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.															
7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>PT Inti Indosawit Subur – Buatan I POM has identified the emission sources and pollution under document of "Enviromental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2019".</p> <p>Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate and Smallholders consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB</p> <p>The assessment of pollution activities was documented in "Mitigasi Has Rumah Kaca". All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p> <p><u>Scheme Smallholder:</u></p>	<p>Non-compliance</p>												

		Manager of Kebun Plasma Buatan has prepared the list significant pollutants and identify sources of emissions, presented in "Identifikasi Sumber Polusi di Perkebunan Petani Kebun Plasma Buatan PT Inti Indosawit Subur 2020". List of significant pollutant such as emission from FFB transportation, water pollutant from fertilizing and spraying activity, emission from generator usage.	
7.10.2	(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.	Complied
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	PT Inti Indosawit Subur – Buatan I POM has identified the significant pollutants and greenhouse gas (GHG) emissions. Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB. Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months, e.g: Subject of analysis for air emission and Air Ambient in Buatan Estate - Report of sampling and analysis: certificate No 00068/CLAIAL, month January 2020 conducted by Sucofindo, the result is comply with Environmental Minister Decree No Kep-13/MENLH/2009, attachment I and The Labour Minister Decree No Kep-13/MEN/2011.	Complied
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	PT Inti Indosawit Subur – Buatan has developed an early warning system, to monitor the risk of fire. The system "Sistem Peringkat Bahaya Kebakaran 1 & 2". The monitoring system calculating the field	Complied

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		<p>condition, ignition risk, potential drought and smoke, fire handling, fire fighting difficulty and weather index. Patrol report indicating any fire incident.</p> <p>Based on field visit in block A21C in Division II Buatan Estate (dated 2nd March 2021), the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in the agreement contract between compay and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p>Scheme Smallholder:</p> <p>There was no any open burning was noted for land preparation and any activity in KUD Sumber Rejeki and KUD Jaya Makmur. Replanting plan has been drawn up in the near future. The replanting plan was available under "S Pelaksanaan Replanting Kebun Plasma Buatan".</p> <p>During field visit at KUD Sumber Rejeki and KUD Jaya Makmur dated 3rd March 2021, there was a replanting and no burning activity. The land preparation is using mechanical method.</p>	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p> <p>Based on field visit in block A21C in Division II Buatan Estate (dated 2nd March 2021), the land preparation is using mechanical method. No</p>	Complied

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		<p>any open burning was noted for land preparation. It can also demonstrated in the agreement contract between compay and subcontractor that all activity of replanting is performed manual and mechanically</p> <p>Scheme Smallholder:</p> <p>During field visit at KUD Sumber Rejeki and KUD Jaya Makmur dated 3rd March 2021, there was a replanting and no burning activity.</p>	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	<p>The policy has communicated to all smallholder remember and local community to engages stakeholders in adjacent locations for fire prevention and control measures, e.g: Record of refreshment socialization in SP-4 in KUD Jaya Makmur, was conducted on 15 December 2020</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p>	Complied

Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

PROCEDURAL NOTE for 7.12:

The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.

The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.

High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.

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<p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1992. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Complied
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>Buatan Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur – Buatan Estate has conducted the HCV identification in coordination with “Fakultas Kehutanan Institut Pertanian Bogor” on March – April 2009, under “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Inti Indosawit Subur, Kebun Buatan Provinsi Riau”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008. HCV Assessor from Forestry Faculty of IPB is RSPO Approved Assessor.</p> <p>Based on HCV identification total HCV area identified was 55.56 ha in Buatan Estate. Buatan Estate is divided in two supply base: Division I, II and III as supply base Buatan I POM and Division IV, V and VI as supply base Buatan II POM (currently the estate name was Simpang Perak Estate). So that the HCV area in Division I, II and III as supply base Buatan I POM was 27.78 ha.</p> <p>HCV identified in Buatan I consist of:</p>	Complied

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		<ul style="list-style-type: none"> - HCV 1.1, 1.2 and 4.1: Riparian zone Kerinci Besar River (38.9 Ha); - HCV 1.1, 1.2 and 4.1: Riparian zone Laniago River (4.50 Ha); - HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 10.5 Ha; - HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 3.60 Ha; - HCV 6: ancient graveyard: 0.66 Ha; <p>HCV identification was consulted to the relevant stakeholder and HCV map is available in place. HCV assessment also including Buatan Smallholder area and used in scheme smallholder operation.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company's plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore no recommendation for wildlife corridor.</p>	
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1992. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	
<p>7.12.3</p>	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>Based on HCV assessment report and field observation confirmed that there is no High Forest Cover Landscapes (HFCLs) within area of PT Inti Indosawit Subur Buatan Estate and Simpang Perak Estate.</p> <p>PT Inti Indosawit Subur Buatan Estate and Simpang Perak Estate was located in another purpose area and not in forest area.</p> <p>This indicator not applicable.</p>	<p>Complied</p>

<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>		
<p>7.12.4</p>	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1992. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>PT Inti Indosawit Subur – Buatan Estate has develop the Conservation Management Plan 2020 and 2021. Evidence Continous monitoring documentation and report regarding the status of RTE species and HCV presented in "Laporan Monitoring tumbuhan dan Satwalier PT Inti Indosawit Subur, Kebun Buatan" Periode January – June 2020 and Juli – December 2020".</p> <p>Monitoring documentation such as: "Daftar Temuan Satwa liar di Areal kebun" contain information regarding result of wildlife and RTE species monitoring, "Tabel Monitoring Kerusakan Kawasan Lindung" contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition. Latest monitoring both RTE species and HCV area conducted on December 2020. Sample seen: Wildlife monitoring in Block F89b period December 2020, found presence of animal such as: Bucerotidae, Orthotmus sp,Prinia familiaris, Macaca fascicularis, Tupaia tana. Monthly monitoring of HCV area condition and animal species also performed by Foreman HCV (Adi Surya P) and each Foreman Afdeling, animal presence recorded in "Daftar Temuan Satwa Liar.</p> <p>Evaluation the effectiveness of management and monitoring plan implementation reported each semester in "laporan Monitoring tumbuhan dan Satwalier PT Inti Indosawit Subur, Kebun Buatan".</p>

		<p>Evaluation result and recommendation of management and monitoring contain in the report. This recommendation give the feedback and improvement to conservation management plan.HCV socialization to Buatan I POM has been conducted on 15 May 2020, attend by 25 mill personel.</p> <p>Company also has implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Based on interview with worker representative and field workers – workers have understand protection of plant and animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal.</p> <p>Scheme Smallholder:</p> <p>Each KUD has appointed person in charge to monitor the RTE species presence in smallholder plantation area:</p> <ul style="list-style-type: none"> - KUD Sumber Rezeki: Surat Keputusan Pengurus KUD Sumber Rezeki Nomor: 12/Kpts/SR/VII/2017 dated 15 February 2017 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. apointed person: Utar Sutarya. - KUD Jaya Makmur: Surat Keputusan Pengurus KUD Jaya Makmur Nomor: 05/Kpts/SR/III/2018 dated 12 March 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. apointed person: Utar Sutarya. <p>Monitoring for RTE species performed each month by PIC. Result of monitoring presented in "Daftar Temuan Satwa Yang Dilindungi Tahun 2020". During January – December 2020, shown that in KUD Jaya Makmur and KUD Sumber Rezeki there were presence of animal such as: Sanca Bodo (<i>Python bivittatus</i>), Kucing hutan (<i>Prionailurus</i></p>	
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		<i>bengalensis</i>), Biawak (<i>Varanus salvator</i>), Elang Tikus (<i>Elanus caeruleus</i>), Burung Madu (<i>Nectarinia jugularis</i>) and Cekakak Belukar (<i>Halcyon smyrnensis</i>).	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024. This indicator not applicable.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	PT. Inti Indosawit Subur – Buatan I POM and Estate has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programmed each year as per “Conservation Management Plan”. Socialization has been conducted through master morning in each division by field assistant, latest refreshment to workers on 5 August 2019. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people. Company also impelemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Interview with workers regarding their understanding on RTE species protection will be conducted during onsite audit later. Smallholder: Training & Socialization has been provided to the individual members about the status of HCV and RTE species and the applicable disciplinary measures. Training was conducted in each KUD by plasma management on 30 January 2020 and 26 November 2020. The training and socialization was attend by smallholder member representative	Complied

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		<p>and KUD official from each KUD, the venue of training was in KUD Sejahtera and Desa Buana Bhakti. Training attend by 60 participant on January and 29 participants on November 2020. Minutes of training and attendant list were available.</p> <p>During onsite audit and interview with smallholder member confirmed that they have sufficient understanding on RTE species protection and prohibition of illegal hunting.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Complied

Appendix B: Approved Time Bound Plan

PT INTI INDOSAWIT SUBUR
 RSPO Membership Number : 1-0022-08-000-00
 Latest Update : 1 July 2021

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
Buatan I Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015 *Split From Buatan Estate Since 1 January 2019
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Ukui I Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016 *Split From Ukui & Soga Estate Since 1 January 2019
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau		
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		
Ukui II Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		
Tungkal Ulu Mill	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 15 August 2012 Re-Certification on August 2017
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency, Jambi		
Muara Bulian Mill	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency, Jambi		Certified on 28 August 2012 Re-Certification on August 2017

Representative : Ivan Novrizaldie

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PT INTI INDOSAWIT SUBUR
 RSP0 Membership Number : 1-0022-06-000-00
 Latest Update : 1 July 2021

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Jambi	Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi		Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau		Certified on 30 March 2015
Taman Raja Mill	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019
Segati Mill	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
Penarikan Mill	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	*Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
Tanah Datar Mill	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera		Certified on 18 May 2015
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2022	*Bahilang Estate On Process RaCP (Recertification 2020)
Aek Nabara Mill	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera		Certified on 6 March 2015
Teluk Panjie Mill	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera		Certified on 21 April 2015
		Teluk Panjie Estate (801 Ha)		2022	HGU is still in Process
Peranap Mill	Simelinyang / Pauh Ranap / Sengkilo	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo		Certified on 7 January 2015

Representative : Ivan Novrizaldie

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PT INTI INDOSAWIT SUBUR
 RSPO Membership Number : 1-0022-06-000-00
 Latest Update : 1 July 2021

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Village, Peranap District, Indragiri Hulu Regency, Riau		Village, Peranap District, Indragiri Hulu Regency, Riau		
		Peranap (Plasma)	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Certified on 18 August 2016
Bungo Tebo Mill	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 3 December 2015
		Bungo Tebo (Plasma)	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 7 February 2017
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
		Pangkalan	Sannah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
Gunung Melayu I	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 7 September 2015
Gunung Melayu II	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 8 July 2015
		Sentral Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	2022	*Sentral Estate On Process RaCP (Recertification 2020)
Negri Lama II	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		- Certified on 23 December 2016 as Independent Mill
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra		- Audit in 2016 as Mill and Supply Base
		Aek Kuo (501 Ha)			HGU Complete Audit at ASA 3 (2018)
Negri Lama I	Negri Lama Seberang Village, Bilah Hilir District,	*3 rd party which is excluded from scope of	Negri Lama Seberang Village, Bilah Hilir District, Labuhan		- Certified on 8 April 2015 - Audit in 2016

Representative : Ivan Novrizaldie

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PT INTI INDOSAWIT SUBUR
 RSPO Membership Number : 1-0022-08-000-00
 Latest Update : 1 July 2021

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Labuhan Batu Regency, North Sumatra	certification	Batu Regency, North Sumatra		as Independent Mill

Appendix C: GHG Reporting Executive Summary

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

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

The summary of the Net GHG emitted in **2020** for **Buatan I Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.03
PKO	0.03

Extraction	%
OER	18.74
KER	5.29

Production	t/yr
FFB Process	250,759
CPO Produced	46,997
PKO Produced	13,275

Land Use	Ha
OP Planted Area	7,589.19
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	4.78
Total	7,593.97

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	4,041.42	1.34	0.00	0.00	0.00	0.00	4,041.42	1.34
CO ₂ Emission from fertilizer	15.70	0.01	2,501.88	0.04	0.00	0.00	2,517.58	0.01
NO ₂ Emission	3.32	0.01	2,396.97	0.04	0.00	0.00	2,400.29	0.01
Fuel Consumption	110.05	0.04	750.70	0.01	0.00	0.00	860.75	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-3,830.73	-1.27	0.00	0.00	0.00	0.00	-3,830.73	-1.27
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Total	339.75	0.11	5,649.56	0.09	0.00	0.00	26,157.25	0.10
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*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4,215.07	0.02
Fuel Consumption	185.28	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-392.09	0.00
Sales of PKS	-28,175.40	-0.11
Sales of EFB	0.00	0.00
Total	-24,167.13	-0.09

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	1,366.53
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	1,366.53

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	4.79
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	95.21

Appendix D: 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	Aug 2019	8,548.28	19,210.10	27,758.39
2	Sept 2019	8,309.73	21,632.00	29,941.73
3	Oct 2019	7,653.97	19,523.23	27,177.20
4	Nov 2019	7,126.79	14,337.95	21,464.74
5	Dec 2019	6,717.64	13,108.80	19,826.44
6	Jan 2020	5,478.93	12,657.75	18,136.68
7	Feb 2020	5,591.02	12,347.80	17,938.82
8	Mar 2020	5,008.76	12,461.48	17,470.24
9	Apr 2020	5,901.69	15,336.71	21,238.40
10	May 2020	5,653.72	14,473.62	20,127.35
11	Jun 2020	6,987.51	17,120.20	24,107.71
12	Jul 2020	5,506.28	16,909.44	22,415.73
13	Aug 2020	5,519.95	19,136.59	24,656.54
14	Sept 2020	5,576.72	17,428.05	23,004.77
15	Oct 2020	5,176.19	15,399.19	20,575.37
16	Nov 2020	5,601.70	15,228.07	20,829.77
17	Dec 2020	5,411.54	14,845.70	20,257.24
18	Jan 2021	5,027.58	13,846.22	18,873.81
19	Feb 2021	4,967.06	10,989.70	15,956.76
Note:				

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Aug 2019	1,667.13	449.59
2	Sept 2019	1,603.22	441.25
3	Oct 2019	1,432.94	410.22
4	Nov 2019	1,363.02	377.68
5	Dec 2019	1,251.94	356.24

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6	Jan 2020	1,027.02	287.61
7	Feb 2020	1,030.78	299.97
8	Mar 2020	938.43	267.90
9	Apr 2020	1,065.63	316.45
10	May 2020	1,015.54	303.54
11	Jun 2020	1,256.68	374.60
12	Jul 2020	972.01	286.97
13	Aug 2020	987.98	291.55
14	Sept 2020	1,000.61	300.46
15	Oct 2020	921.08	278.27
16	Nov 2020	1,002.50	288.37
17	Dec 2020	981.35	274.03
18	Jan 2021	868.95	256.86
19	Feb 2021	878.35	253.93
Note:			

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Buatan I KCP	RSPO_PO1000002758	-	401.790
2	Buatan I KCP	RSPO_PO1000002758	-	455.460
3	Buatan I KCP	RSPO_PO1000002758	-	772.000
4	Buatan I KCP	RSPO_PO1000002758	-	-
5	Buatan I KCP	RSPO_PO1000002758	-	639.000
6	Buatan I KCP	RSPO_PO1000002758	-	239.000
7	Buatan I KCP	RSPO_PO1000002758	-	94.400
8	Buatan I KCP	RSPO_PO1000002758	-	456.340
9	Buatan I KCP	RSPO_PO1000002758	-	355.980
10	Buatan I KCP	RSPO_PO1000002758	-	165.200
11	Buatan I KCP	RSPO_PO1000002758	-	-
12	Buatan I KCP	RSPO_PO1000002758	-	402.110
13	Buatan I KCP	RSPO_PO1000002758	-	222.490
14	Buatan I KCP	RSPO_PO1000002758	-	678.310
15	Buatan I KCP	RSPO_PO1000002758	-	134.870

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16	Buatan I KCP	RSPO_PO1000002758	-	-
17	Buatan I KCP	RSPO_PO1000002758	-	660.180
18	Buatan I KCP	RSPO_PO1000002758	-	393.960
19	Buatan I KCP	RSPO_PO1000002758	-	-
Note:				

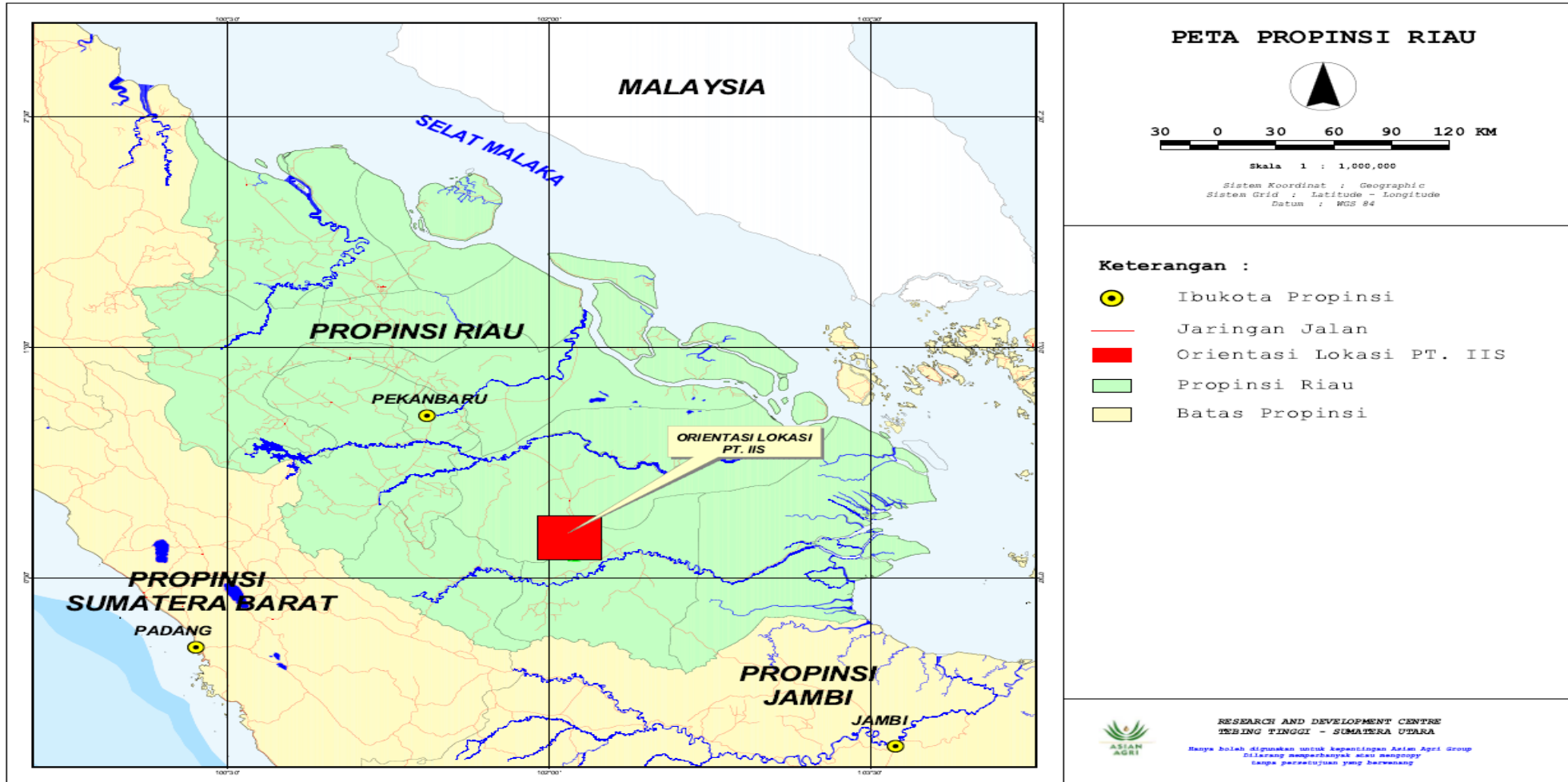
D. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Classified	ISCC	16,565.94	-
2	Classified	ISCC	4,647.25	-
Note:				

E. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	Nil	Nil	Nil
Note:			

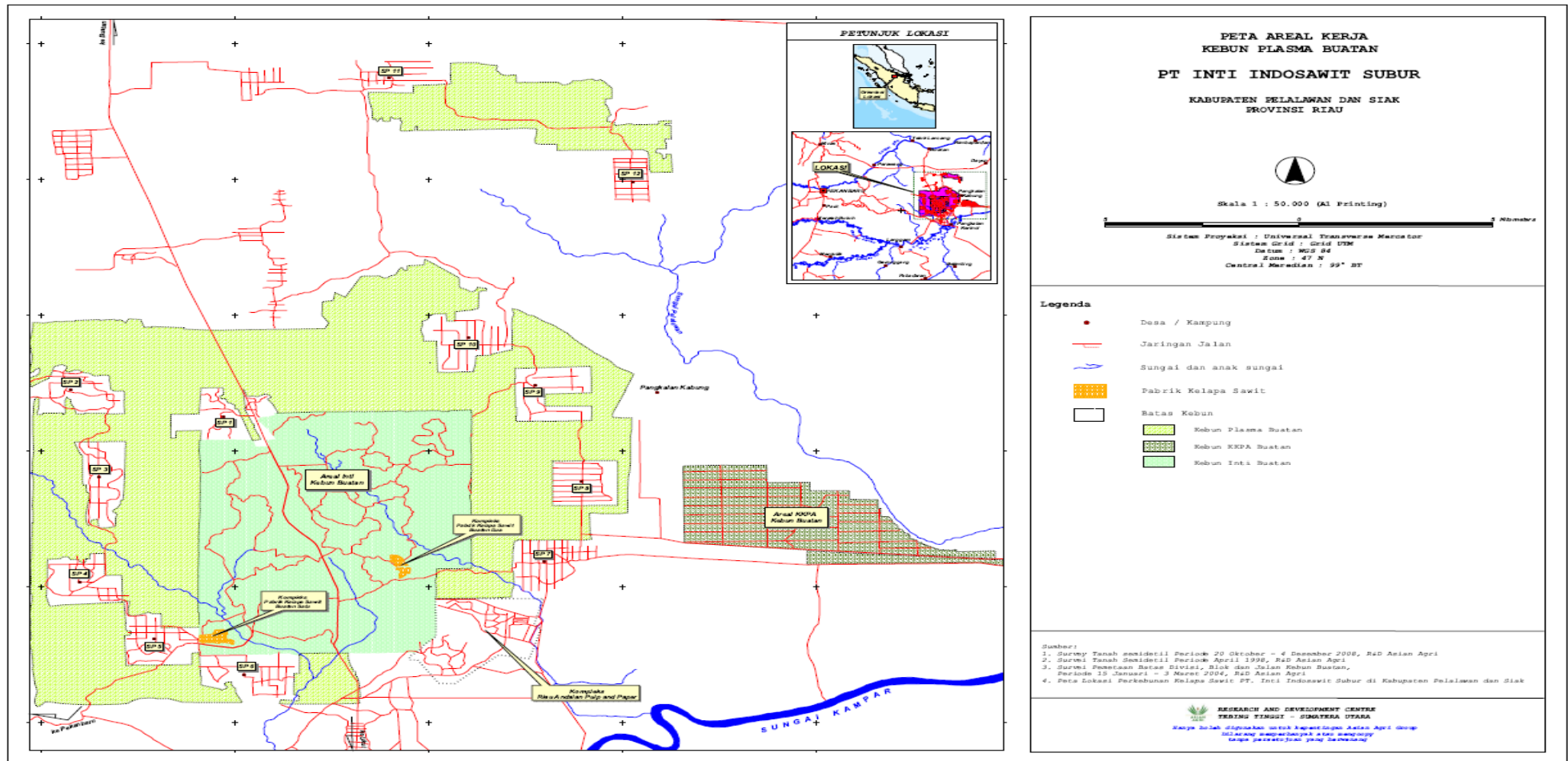
F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil	Nil	Nil
Note:			

Appendix E: Location Map of Certification Unit and Supply bases





Appendix F: Estate Field Map



Appendix G: List of Smallholder Sampled

Location	KUD	HAMPARAN (KT)	Name of Smallholder	Kavling / Block	Land Title (SHM) number	Certified area (ha)
SP 4	Jaya Makmur	56	Musimin	1449	5223	2.00
			Sujono	1451	774	2.00
			Ahmad Saeri	1475	775	2.00
		60	Ngadi	1604	727	2.00
			Nasib Wiyono	1619	-	2.00
			Ngatimah	1645	819	2.00
			Sari	1647	111	2.00
		97	Sumi	1568	699	2.00
			Jumi'an	1577	709	2.00
			Mahyun	1579	698	2.00
			Rustamari	1582	703	2.00
		99	Izharsyah	1678	235	2.00
			Salimin	1724	743	2.00
			Sopanudin	1725	742	2.00
		SP 5	Sumber Rezeki	100	Edi	1674
Salam	1728				760	2.00
Suradi	1740				756	2.00
73	Irin			2183	226	2.00
	Karsinah			2166	198	2.00
	Runiah			2182	209	2.00
	Suwanto			2098	199	2.00
67	Karlan			2010	113	2.00
	Munawin			2125	110	2.00
	Monang Manulang			2048	105	2.00
SP 6	Sejahtera	68	Neri	2046	99	2.00
			Utar Sutarya	2138	173	2.00
			Riaman	2142	164	2.00
			Sumarlan	2146	135	2.00

Appendix H: List of Abbreviations

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